# EXHIBIT 6

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

ARTIS ELLIS,

:

Plaintiff,

•

Vs.

CIVIL ACTION NO.

1

EDUCATIONAL COMMISSION FOR FOREIGN MEDICAL

4:14-cv-02126

FOR FOREIGN MEDICAL GRADUATES,

:

Defendant.

\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

VIDEOTAPED / REALTIMED DEPOSITION OF

TROI A. BRYANT

SEPTEMBER 8, 2016

\*\*\*\*\*\*\*\*\*\*\*\*\*

VIDEOTAPED / REALTIMED DEPOSITION of TROI A.

BRYANT, produced as a witness at the instance of the

Defendant, and duly sworn, was taken in the

above-styled and numbered cause on Thursday, the 8th

day of September, 2016, from 11:18 a.m. to 1:09 p.m.,

before Pat English-Arredondo, CSR, RMR, CRR in and for

the State of Texas, reported by machine shorthand in

realtime translation, at the law offices of Morgan,

Lewis & Bockius, LLP, 1000 Louisiana Street,

Suite 4000, Houston, Texas, pursuant to the Federal

Rules of Civil Procedure; that the Witness will read

the deposition.

1			
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1	APPEARANCES	1	EXHIBITS INDEX
2	COUNSEL FOR PLAINTIFF ARTIS ELLIS:  Ms. Keenya R. Harrold	2	VIDEOTAPED / REALTIMED DEPOSITION C
,	KENNARD		TROI A. BRYANT
4	2603 Augusta Drive, 14th Floor Houston, Texas 77057	3	SEPTEMBER 8, 2016
5	Phone: 713.742.0900		NOS.
6	e-mail: keenya.harrold@kennardlaw.com	4	•
0	COUNSEL FOR DEFENDANT EDUCATIONAL COMMISSION FO	R 5	NUMBER DESCRIPTION PAGE
7 8	FOREIGN MEDICAL GRADUATES:  Ms. Erin E. O'Driscoll	6	EXHIBIT 1 Subpoena issued to Mr. Bryant, 9
	MORGAN, LEWIS & Bockius, LLP	7	with attachments, 8 pages
9	1000 Louisiana, Suite 4000 Houston, Texas 77002	8	EXHIBIT 2 Personnel files for Mr. Bryant 49
10	Phone: 713,890.5000	9	at ECFMG, top document titled "Notice to All Standardized
11	e-mail: codriscoll@morganlewis.com	10	Patients and Acknowledgement
11	ALSO PRESENT:	11 12	of Receipt," dated 11-3-08 and
12	Ms. Artis Ellis	13	signed by Troi Bryant, Bates
13		14	Nos, ECFMG-ELLIS 007267 - 239
14	VIDEOGRAPHER:	15	EXHIBIT 3 ECFMG Personnel Information 63
	Mr. Jamie Rodgers	16	Change Form, Bates ECFMG-ELLIS
15	COURT REPORTER:	17	007235 - 223
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17	Ms. Pat English-Arredondo, CSR, RMR, CRR, CLR	19	Collaboration (CSEC)
18		20	Ownership, Confidentiality,
19 20		21	and Non-Disclosure Agreement,
21		22	Bates ECFMG-ELLIS 007227-7231
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2 (Pages 2 to 5)

		6		8
1111::20::29	1	THE VIDEOGRAPHER: Good morning. It's	1	Q. We do have a video here today, but just so
1111::20::32	2	Thursday, September 8, 2016. The time is approximate	y 2	that we'll be able to read it on the written record, as
1111::20::38	3	11:18 a.m., and we are on the record.	3	well, what your responses are.
11:20:38	4	THE REPORTER: We're taking this	. 4	A. Sure.
	5	pursuant to Federal Rules. Correct?	5	Q. Okay. Wonderful.
11:20:39	6	MS. O'DRISCOLL: Yes.	6	And if you don't understand my question,
11:20:41	7	THE REPORTER: And you-all have chosen	7	if you could just please let me know, I'm happy to
1111::20::43	8	to waive the reading of the 30(b)(5).	8	rephrase it. And if you don't ask me to clarify or
11:20:46	9	Sir, will you go ahead and raise your	9	rephrase it, then I'm just going to assume that you
1111::20::29	10	right hand to be administered the oath?	10	understand my question.
1111::20::49	11	TROI A. BRYANT,	11	Does that make sense?
11:20:50	12	being called as a witness, and having been duly sworn,	12	A. Sure.
11:20:59	13	testified as follows:	13	Q. Okay. Mr. Bryant, what did you do to prepare
11:21:01	14	THE WITNESS: Yes.	14	for your deposition today?
1111::219::03	15	THE REPORTER: Thank you, sir.	15	A. Scheduled off to be here.
1111::219::078	16	EXAMINATION	16	Q. Okay. Did you meet with anyone to discuss
11:21:10	17	BY MS. O'DRISCOLL:	17	the facts of this lawsuit or what the allegations are?
1111::219::28	18	Q. Can you state your full name for the record,	18	A. Well, I actually got some counsel from my
1111::219::B8	19	sir?	19	brother-in-law he's a judge because I've never
1111::219::20	. 20	A. Troi Alan Bryant.	20	been to a deposition before.
11:21:22	21	Q. Okay, Mr. Bryant. My name is Erin O'Driscoll	21	Q. Okay. Have you looked up the pleadings or
1111::219::218	22	and I represent ECFMG in a matter that Ms. Artis Ellis	22	any of the
11:19:41	23	has filed, a lawsuit in federal court.	23	A. No.
1111::219::24	24	Do you understand I represent the company	24	Q allegations in this matter?
1111::219::25	25	and I do not represent you? Do you understand that?	25	A. No, no.
		7		9
11:29:48	1	A. Uh-huh.	1	Q. And did you review any documents or anythin
11:29:49	2	Q. Okay. And are you represented at all by a	2	that may be that may be related to this matter in
11:29:31	3	lawyer today?	3	any way?
11:29:32	4	A. Do I need one?	4	A. No, other than the ones I signed, the
11:29:56	5	Q. You're just a fact witness. You're not a	5	subpoena that I signed.
11:29:33	6	party to this lawsuit, so	6	Q. Okay. And that's the subpoena that you were
11:29:39	7	A. No.	7	served with?
11:29:39	8	Q. I just wanted to make sure there wasn't	8	A. Right, right.
11:20:00	9	anything I wasn't aware of.	. 9	Q. And the subpoena that you were served with
11:20:05	10	A. Oh, no, no.	10	I'm going to mark as Exhibit No. 1.
11:20:08	11	Q. Okay. And Ms. Keenya Harrold, Ms. Artis	1.1	(Marked was Bryant Exhibit No. 1.)
Tr.Tr. 44 50 00 4 (V 2)	12	Ellis' lawyer, she does not represent you. Is that	12	Q. (By Ms. O'Driscoll) Is this the subpoena
111:20:08		A. No, no. No, huh-uh.	13	1
11:20:08				that you referenced a moment ago?
11:20:09	13			that you referenced a moment ago?  A. (Reviewing) Ves.
11:20:09 11:20:19	14	Q. And if you wouldn't mind just letting me	14	A. (Reviewing) Yes.
11:20:09 11:20:19 11:20:20	14 15	Q. And if you wouldn't mind just letting me finish my question before you start to respond? An	14 15	A. (Reviewing) Yes. Q. And you were served by a process server and
11:20:09 11:20:19 11:20:20 11:20:25	14 15 16	Q. And if you wouldn't mind just letting me finish my question before you start to respond? An that's just so that it's very clear for the court	14 1 15 16	A. (Reviewing) Yes.  Q. And you were served by a process server and given a witness fee to appear today?
11:20:09 11:20:19 11:20:20 11:20:25	14 15 16 17	Q. And if you wouldn't mind just letting me finish my question before you start to respond? An that's just so that it's very clear for the court reporter so that because she can't type what we're	14 1 15 16 17	A. (Reviewing) Yes. Q. And you were served by a process server and given a witness fee to appear today? A. Yes.
N1:20:09 N1:20:19 P1:20:29 N1:20:25 N1:20:25	14 15 16 17 18	Q. And if you wouldn't mind just letting me finish my question before you start to respond? An that's just so that it's very clear for the court reporter so that because she can't type what we're saying both at the same time.	14 1 15 16 17 18	<ul> <li>A. (Reviewing) Yes.</li> <li>Q. And you were served by a process server and given a witness fee to appear today?</li> <li>A. Yes.</li> <li>Q. And is that your signature on Page 2 towards</li> </ul>
11:20:09 11:20:19 11:20:20 11:20:25 11:20:25 11:20:25 11:20:28	14 15 16 17 18 19	Q. And if you wouldn't mind just letting me finish my question before you start to respond? An that's just so that it's very clear for the court reporter so that because she can't type what we're saying both at the same time.  A. Absolutely. Uh-huh.	14 1 15 16 17 18 19	<ul> <li>A. (Reviewing) Yes.</li> <li>Q. And you were served by a process server and given a witness fee to appear today?</li> <li>A. Yes.</li> <li>Q. And is that your signature on Page 2 towards the bottom?</li> </ul>
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11:20:09 11:20:19 11:20:20 11:20:25 11:20:25 11:20:25 11:20:25 11:20:28	14 15 16 17 18 19 20 21	Q. And if you wouldn't mind just letting me finish my question before you start to respond? And that's just so that it's very clear for the court reporter so that because she can't type what we're saying both at the same time.  A. Absolutely. Uh-huh.  Q. And if you could continue to answer verbally	14 1 15 16 17 18 19 20 21	<ul> <li>A. (Reviewing) Yes.</li> <li>Q. And you were served by a process server and given a witness fee to appear today?</li> <li>A. Yes.</li> <li>Q. And is that your signature on Page 2 towards the bottom?</li> <li>A. Yes.</li> <li>Q. And if you could skip to the last page that's</li> </ul>
11:20:09 11:20:19 11:20:20 11:20:25 11:20:25 11:20:25 11:20:25 11:20:25 11:20:28	14 15 16 17 18 19 20 21 22	Q. And if you wouldn't mind just letting me finish my question before you start to respond? And that's just so that it's very clear for the court reporter so that because she can't type what we're saying both at the same time.  A. Absolutely. Uh-huh.  Q. And if you could continue to answer verbally  A. Okay.	14 1 15 16 17 18 19 20 21 22	<ul> <li>A. (Reviewing) Yes.</li> <li>Q. And you were served by a process server and given a witness fee to appear today?</li> <li>A. Yes.</li> <li>Q. And is that your signature on Page 2 towards the bottom?</li> <li>A. Yes.</li> <li>Q. And if you could skip to the last page that's listed as Exhibit A of that document</li> </ul>
11:20:09 11:20:19 11:20:25 11:20:25 11:20:25 11:20:25 11:20:25 11:20:28 11:20:28	14 15 16 17 18 19 20 21 22 23	Q. And if you wouldn't mind just letting me finish my question before you start to respond? An that's just so that it's very clear for the court reporter so that because she can't type what we're saying both at the same time.  A. Absolutely. Uh-huh. Q. And if you could continue to answer verbally A. Okay. Q and so just don't nod your head up and	14 1 15 16 17 18 19 20 21 22 23	A. (Reviewing) Yes. Q. And you were served by a process server and given a witness fee to appear today? A. Yes. Q. And is that your signature on Page 2 towards the bottom? A. Yes. Q. And if you could skip to the last page that's listed as Exhibit A of that document A. Uh-huh.
11:20:09 11:20:19 11:20:20 11:20:25 11:20:25 11:20:25 11:20:25 11:20:28 11:20:29	14 15 16 17 18 19 20 21 22	Q. And if you wouldn't mind just letting me finish my question before you start to respond? And that's just so that it's very clear for the court reporter so that because she can't type what we're saying both at the same time.  A. Absolutely. Uh-huh.  Q. And if you could continue to answer verbally  A. Okay.	14 1 15 16 17 18 19 20 21 22	<ul> <li>A. (Reviewing) Yes.</li> <li>Q. And you were served by a process server and given a witness fee to appear today?</li> <li>A. Yes.</li> <li>Q. And is that your signature on Page 2 towards the bottom?</li> <li>A. Yes.</li> <li>Q. And if you could skip to the last page that's listed as Exhibit A of that document</li> </ul>

	l .	10		12
11:22:40	1	A. No. Other than communications, no.	1	this case?
11:28:54	2	Q. I'm sorry?	2	A. Vaguely.
11:22:94	3	A. Other than communications, no.	3	Q. And how do you know that?
11:22:96	4	Q. And what do you mean by "communications"?	4	A. Something has to do with our relationship or
11:22:58	5	A. Just my knowledge of whatever you're going to	l .	past relationship and employment. That's what I know.
11:23:00	6	ask me. Nothing written.	6	Q. Okay, Anything else?
11:23:62	7	Q. And did you take a moment, when you received	7	A. No.
11:23:05	8	this subpoena, to review to see if you had any	8	Q. And when you said "employment," is that
11:23:09	9	documents or things or communications to or from or	9	employment at ECFMG?
11:23:08	10	between you or ECFMG before, during, or after your	10	A. Yes, Yes, employment at ECFMG.
11:23:09	11	employment at ECFMG?	11	Q. Because you-all both worked there at the same
11:23:19	12	A. Yes, I did.	12	time?
11:23:19	13	Q. And you didn't have any documents?	13	A. Yes. Yes, uh-huh.
11:23:21	14	A. No.	14	Q. And I just wanted to also mention just at
11:23:24	15	Q. Okay. And that was Request No. 1 on that	15	the very beginning I meant to tell you if you need a
11:23:23	16	Exhibit A.	16	break at any time, just feel free to let us know and
11:23:29	17	A. Right, right.	17	we're happy to let you go to the restroom or get a
11:25:24	18	Q. And on Request No. 2, "All documents and	18	drink or stretch.
11:23:24	19	things and communications to or from or between you an	d 19	I don't think we're going to be here for
11:23:35	20	Artis Ellis (also known as Artis Fowler or Artis Harden	20	very long, but I just wanted to make sure in case you
11:23:20	21	or any variation thereof) from January 1, 2007 to	21	need a break. I would just ask that you finish
11:23:29	22	present."	22	answering the question, if there is one pending
11:23:41	23	Did you check and see if you had any	23	A. Sure.
11:23:33	24	documents responsive?	24	Q before we take the break.
11:23:83	25	A. No, I don't.	25	A. Sure.
	CONTRACTOR OF THE SECOND SECOND	11		13
11::23:45	1	Q. And then No. 3, "All documents and material	s 1	Q. And then also, as you know, you're under oath
11::23:43	2	reviewed by you in preparation for your deposition."	2	today as if you're testifying before a judge and jury
11::25::99	3	You already said you didn't review	3	and you understand that that's under penalty of
11::25:91	4	anything.	4	perjury?
11:25:31	5	A. Right.	5	A. Yes, ma'am.
.1:23:52	6	Q. Okay. And have you ever spoken with	6	Q. Okay, great.
11:23:52	7	Ms. Harrold or anyone in her office, in Artis Ellis'	7	And when you said just a moment ago, when
11:23:59	8	attorneys office, whether a paralegal or any other	8	I asked you about what this lawsuit was about, you said
11::25:56	9	attorneys, prior to today?	9	you had a vague knowledge about that.
11::25:58	10	A. Briefly yesterday.	10	A. Uh-huh.
111::26:53	11	Q. Okay. Did you speak what time of day	11	Q. You referenced that it was that it was
11::26:D5	12	yesterday?	12	your understanding that it was about your relationship
11:26:03	13	A. Late evening. I'm not sure.	13	with Ms. Artis Ellis.
.1:24:17	14	Q. And how long did you talk for?	14	A. Uh-huh.
11::26:D9	15	A. Five minutes.	15	Q. How did you know that?
111::245:2D	16	Q. Okay. And what did you talk about?	16	A. I'm not sure. I don't remember how I know
111::25:23	17	A. She just wanted to make sure I was going t		that. I just know that.
11:26:25	18	be here.	18	Q. Was it through talking with Ms. Keenya
11:26:15	19	Q. Okay.	19	Harrold?
11:26:26	20	A. And that I knew where I was going.	20	A. It could have been
.1:24:28	21	Q. Okay. And did you-all discuss anything else	21	Q. Okay.
111::26:36	22	about the case or about Ms. Artis' allegations in the	22	A part of that conversation, I guess. I'm
111::246::38	23	case?	23	not sure.
111::245::3.8	24	A. No.	24	Q. And do you remember anything else that might

	_		<del></del>	
		14		16
11:28:25	1	Ms. Keenya or anybody else in her office?	1	ago, something.
11:28:34	2	A. No, I haven't spoken to anyone else in her	2	Q. Okay. And how did you meet Ms. Ellis?
11:20:04	3	office.	3	A. I can't recall exactly how I met her. I'm
11:20:04	4	Q. Have you spoken with Ms. Artis Ellis at any	4	not sure. Kind of like knew the same people, I guess.
11:20:67	5	time in the last two years prior to coming today, this	5	Q. Did you-all go to school together?
11:20:42	6	morning?	6	A. Not really.
11:20:43	7	A. On occasion. During the holidays, I guess.	7	Q. I mean
11:20:44	8	Q. Okay. And is that normal, for you-all to	8	A. We attended the same school, but we didn't go
11:20:50	9	talk during the holidays?	9	to school together.
11:20:52	10	A. Well, at least text or yeah.	10	Q. But you attended the same school?
11:29:19	11	Q. Okay.	11	A. I'm older than her, so I think I was gone
11:29:22	12	A. Yes.	12	already. I'm not sure how much older I am than her.
11:29:06	13	Q. And do you-all text each other back pretty	13	vaguely remem I didn't know her very well. When we
11:29:06	14	freely?	14	were young people, I didn't know her very well.
11:29:00	15	A. I'm not sure what you mean by that.	15	Q. Okay. So you said you went to school but
11:29:68	16	Q. Well, how often? What's a normal week for	16	you did attend the same schools?
11:29:34	17	you-all to communicate as far as number of times?	17	A. Yes.
11:29:35	18	A. It wouldn't be weekly. I would say	18	Q. Was it high school?
	1	• • •	19	
11:29:35	19	seasonally during the holidays.	i	A. High school, yes.
11:29:36	20	Q. So during any of the holidays?	20	Q. What about middle school?
11:29:20	21	A. Christmas, Thanksgiving, New Year. Happy No	1	A. No. Not that I know of.
11:29:39	22	Year's.	22	Q. What about college?
11:29:20	23	Q. Okay. Mr. Bryant, are you currently married?	2.3	A. No.
11:29:34	24	A. Yes.	24	Q. Elementary school?
11:29:35	25	Q. And what is your wife's name?	25	A. No.
		15		. 17
11:29:30	1	A. Jacquelyn.	1	Q. And what high school did you attend?
11:27:39	2	Q. And how long have you been married to her	r <mark>!</mark> ? 2	A. Ross Shaw Sterling.
11:27:48	3	A. 27, 28 years.	3	Q. And did you attend that school for all four
11:29:48	4	Q. And have you ever been married before that	2 4	years of high school?
11:27:49	5	A. No.	5	A. Yes.
11:27:49	6			
		Q. And do you have any children?	6	Q. You said that you and Artis knew some of the
11:20:00	7	<ul><li>Q. And do you have any children?</li><li>A. Yes.</li></ul>	6 7	Q. You said that you and Artis knew some of the same people.
11:20:90 11:20:93	1	A. Yes.	i	Q. You said that you and Artis knew some of the same people.  A. I would imagine because we went to the
	7	<ul><li>A. Yes.</li><li>Q. And how many children do you have?</li></ul>	7	same people.  A. I would imagine because we went to the
11:20:98 11:20:98	7 8 9	<ul><li>A. Yes.</li><li>Q. And how many children do you have?</li><li>A. Three.</li></ul>	7 8 9	A. I would imagine because we went to the same yes, I'm sure we did.
11:20:98 11:20:95 11:27:54	7 8 9 10	<ul><li>A. Yes.</li><li>Q. And how many children do you have?</li><li>A. Three.</li><li>Q. And what are their names?</li></ul>	7 8	A. I would imagine because we went to the same yes, I'm sure we did. Q. Okay.
11:20:98 11:20:98 11:27:54 11:20:98	7 8 9 10 11	<ul><li>A. Yes.</li><li>Q. And how many children do you have?</li><li>A. Three.</li><li>Q. And what are their names?</li><li>A. Brittani, Troi and Ervin.</li></ul>	7 8 9 10 11	same people.  A. I would imagine because we went to the same yes, I'm sure we did.  Q. Okay.  A. I'm not sure who they were, but
11:20:98 11:20:98 11:27:54 11:20:98 11:20:00	7 8 9 10 11 12	<ul> <li>A. Yes.</li> <li>Q. And how many children do you have?</li> <li>A. Three.</li> <li>Q. And what are their names?</li> <li>A. Brittani, Troi and Ervin.</li> <li>Q. And how old are they?</li> </ul>	7 8 9 10 11 12	same people.  A. I would imagine because we went to the same yes, I'm sure we did.  Q. Okay.  A. I'm not sure who they were, but  Q. You don't remember their names?
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11:30:98 11:27:54 11:27:54 11:20:98 11:20:00 11:20:02	7 8 9 10 11 12 13 14	<ul> <li>A. Yes.</li> <li>Q. And how many children do you have?</li> <li>A. Three.</li> <li>Q. And what are their names?</li> <li>A. Brittani, Troi and Ervin.</li> <li>Q. And how old are they?</li> <li>A. 29, 22 and 20.</li> <li>Q. And</li> </ul>	7 8 9 10 11 12 13	same people.  A. I would imagine because we went to the same yes, I'm sure we did.  Q. Okay.  A. I'm not sure who they were, but  Q. You don't remember their names?  A. No, no.  Q. You think that you may be a year or two older.
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11:30:98 11:27:54 11:27:54 11:30:98 11:28:00 11:28:13 11:28:13	7 8 9 10 11 12 13 14 15	<ul> <li>A. Yes.</li> <li>Q. And how many children do you have?</li> <li>A. Three.</li> <li>Q. And what are their names?</li> <li>A. Brittani, Troi and Ervin.</li> <li>Q. And how old are they?</li> <li>A. 29, 22 and 20.</li> <li>Q. And</li> <li>A. Or 19. He will be 20 soon.</li> <li>Q. Sorry. Who will be</li> </ul>	7 8 9 10 11 12 13 14 15 16	same people.  A. I would imagine because we went to the same yes, I'm sure we did.  Q. Okay.  A. I'm not sure who they were, but  Q. You don't remember their names?  A. No, no.  Q. You think that you may be a year or two older than her?  A. At least.
11:30:98 11:27:54 11:28:98 11:28:00 11:28:02 11:28:13 11:28:13 11:28:26 11:28:26	7 8 9 10 11 12 13 14 15 16	<ul> <li>A. Yes.</li> <li>Q. And how many children do you have?</li> <li>A. Three.</li> <li>Q. And what are their names?</li> <li>A. Brittani, Troi and Ervin.</li> <li>Q. And how old are they?</li> <li>A. 29, 22 and 20.</li> <li>Q. And</li> <li>A. Or 19. He will be 20 soon.</li> <li>Q. Sorry. Who will be</li> <li>A. My youngest will be 20 in October.</li> </ul>	7 8 9 10 11 12 13 14 15 16 17	same people.  A. I would imagine because we went to the same yes, I'm sure we did.  Q. Okay.  A. I'm not sure who they were, but  Q. You don't remember their names?  A. No, no.  Q. You think that you may be a year or two older than her?  A. At least.  Q. And did you-all attend the same church?
11:20:98 11:27:54 11:27:54 11:20:98 11:20:00 11:20:13 11:20:13 11:20:13 11:20:26 11:20:28	7 8 9 10 11 12 13 14 15 16 17	<ul> <li>A. Yes.</li> <li>Q. And how many children do you have?</li> <li>A. Three.</li> <li>Q. And what are their names?</li> <li>A. Brittani, Troi and Ervin.</li> <li>Q. And how old are they?</li> <li>A. 29, 22 and 20.</li> <li>Q. And</li> <li>A. Or 19. He will be 20 soon.</li> <li>Q. Sorry. Who will be</li> <li>A. My youngest will be 20 in October.</li> <li>Q. And what are their last names?</li> </ul>	7 8 9 10 11 12 13 14 15 16 17	same people.  A. I would imagine because we went to the same yes, I'm sure we did.  Q. Okay.  A. I'm not sure who they were, but  Q. You don't remember their names?  A. No, no.  Q. You think that you may be a year or two older than her?  A. At least.  Q. And did you-all attend the same church?  A. No.
11:20:98 11:27:54 11:27:54 11:20:98 11:20:00 11:20:13 11:20:13 11:20:26 11:20:26 11:20:26	7 8 9 10 11 12 13 14 15 16 17 18	<ul> <li>A. Yes.</li> <li>Q. And how many children do you have?</li> <li>A. Three.</li> <li>Q. And what are their names?</li> <li>A. Brittani, Troi and Ervin.</li> <li>Q. And how old are they?</li> <li>A. 29, 22 and 20.</li> <li>Q. And</li> <li>A. Or 19. He will be 20 soon.</li> <li>Q. Sorry. Who will be</li> <li>A. My youngest will be 20 in October.</li> <li>Q. And what are their last names?</li> <li>A. Bryant.</li> </ul>	7 8 9 10 11 12 13 14 15 16 17 18	same people.  A. I would imagine because we went to the same yes, I'm sure we did.  Q. Okay.  A. I'm not sure who they were, but  Q. You don't remember their names?  A. No, no.  Q. You think that you may be a year or two older than her?  A. At least.  Q. And did you-all attend the same church?  A. No.  Q. And did you and Ms. Ellis ever date?
11:20:98 11:27:54 11:27:54 11:20:98 11:20:00 11:20:13 11:20:13 11:20:26 11:20:26 11:20:26	7 8 9 10 11 12 13 14 15 16 17 18 19 20	<ul> <li>A. Yes.</li> <li>Q. And how many children do you have?</li> <li>A. Three.</li> <li>Q. And what are their names?</li> <li>A. Brittani, Troi and Ervin.</li> <li>Q. And how old are they?</li> <li>A. 29, 22 and 20.</li> <li>Q. And</li> <li>A. Or 19. He will be 20 soon.</li> <li>Q. Sorry. Who will be</li> <li>A. My youngest will be 20 in October.</li> <li>Q. And what are their last names?</li> <li>A. Bryant.</li> <li>Q. And who are the mothers of those children?</li> </ul>	7 8 9 10 11 12 13 14 15 16 17 18 19 20	same people.  A. I would imagine because we went to the same yes, I'm sure we did.  Q. Okay.  A. I'm not sure who they were, but  Q. You don't remember their names?  A. No, no.  Q. You think that you may be a year or two older than her?  A. At least.  Q. And did you-all attend the same church?  A. No.  Q. And did you and Ms. Ellis ever date?  A. No.
11:20:98 11:27:54 11:27:54 11:20:98 11:20:00 11:20:13 11:20:13 11:20:26 11:20:26 11:20:26 11:20:26 11:20:28	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Yes. Q. And how many children do you have? A. Three. Q. And what are their names? A. Brittani, Troi and Ervin. Q. And how old are they? A. 29, 22 and 20. Q. And A. Or 19. He will be 20 soon. Q. Sorry. Who will be A. My youngest will be 20 in October. Q. And what are their last names? A. Bryant. Q. And who are the mothers of those children? Mother or mothers?	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	same people.  A. I would imagine because we went to the same yes, I'm sure we did.  Q. Okay.  A. I'm not sure who they were, but  Q. You don't remember their names?  A. No, no.  Q. You think that you may be a year or two older than her?  A. At least.  Q. And did you-all attend the same church?  A. No.  Q. And did you and Ms. Ellis ever date?  A. No.  Q. Did you ever have any romantic involvement at
11:20:98 11:27:54 11:27:54 11:20:98 11:20:00 11:20:13 11:20:13 11:20:26 11:20:26 11:20:26 11:20:28 11:20:28 11:20:28	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Yes. Q. And how many children do you have? A. Three. Q. And what are their names? A. Brittani, Troi and Ervin. Q. And how old are they? A. 29, 22 and 20. Q. And A. Or 19. He will be 20 soon. Q. Sorry. Who will be A. My youngest will be 20 in October. Q. And what are their last names? A. Bryant. Q. And who are the mothers of those children? Mother or mothers? A. Jacquelyn is the mother of Troi and Ervin.	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	same people.  A. I would imagine because we went to the same yes, I'm sure we did.  Q. Okay.  A. I'm not sure who they were, but  Q. You don't remember their names?  A. No, no.  Q. You think that you may be a year or two older than her?  A. At least.  Q. And did you-all attend the same church?  A. No.  Q. And did you and Ms. Ellis ever date?  A. No.  Q. Did you ever have any romantic involvement at all?
11:30:98 11:27:54 11:20:98 11:28:00 11:28:13 11:28:13 11:28:26 11:28:26 11:28:26 11:28:26 11:28:34 11:28:36 11:28:36	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Yes. Q. And how many children do you have? A. Three. Q. And what are their names? A. Brittani, Troi and Ervin. Q. And how old are they? A. 29, 22 and 20. Q. And A. Or 19. He will be 20 soon. Q. Sorry. Who will be A. My youngest will be 20 in October. Q. And what are their last names? A. Bryant. Q. And who are the mothers of those children? Mother or mothers? A. Jacquelyn is the mother of Troi and Ervi and Artis is the mother of Brittani.	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	same people.  A. I would imagine because we went to the same yes, I'm sure we did.  Q. Okay.  A. I'm not sure who they were, but  Q. You don't remember their names?  A. No, no.  Q. You think that you may be a year or two older than her?  A. At least.  Q. And did you-all attend the same church?  A. No.  Q. And did you and Ms. Ellis ever date?  A. No.  Q. Did you ever have any romantic involvement at all?  A. Yes.
11:20:98 11:27:54 11:27:54 11:20:98 11:20:00 11:20:13 11:20:13 11:20:26 11:20:26 11:20:26 11:20:28 11:20:28 11:20:28	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Yes. Q. And how many children do you have? A. Three. Q. And what are their names? A. Brittani, Troi and Ervin. Q. And how old are they? A. 29, 22 and 20. Q. And A. Or 19. He will be 20 soon. Q. Sorry. Who will be A. My youngest will be 20 in October. Q. And what are their last names? A. Bryant. Q. And who are the mothers of those children? Mother or mothers? A. Jacquelyn is the mother of Troi and Ervin.	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	same people.  A. I would imagine because we went to the same yes, I'm sure we did.  Q. Okay.  A. I'm not sure who they were, but  Q. You don't remember their names?  A. No, no.  Q. You think that you may be a year or two older than her?  A. At least.  Q. And did you-all attend the same church?  A. No.  Q. And did you and Ms. Ellis ever date?  A. No.  Q. Did you ever have any romantic involvement at all?

		18		20
111:30:58	1	Q. Okay. And when was that?	1	the prom?
111.::30:59	2	A. I don't recall exactly when it was, but just	2	A. It was later that yeah. Later that night,
111::33::23	3	prior to my daughter being conceived.	3	veah.
11:33:26	4	Q. Okay.	4	Q. And where was that?
111:33:06	5	A. Yeah, but I don't know dates and times.	5	A. What do you mean?
111::33:28	6	Q. Okay. So you when you say "once," was	6	Q. Location-wise, geographically, where was
11:33:29	7	that one period of time? Was that	7	that?
111:33:30	8	A. One encounter.	8	A. In Houston.
111::33:38	9	Q. Okay. And when you say "encounter," you me		Q. Okay. Was it in a house? Was it in a
111:33:39	10	sexual encounter?	10	school?
111:33:20	11	A. Sexual encounter, yes.	11	A. It was
111::33:27	12	Q. And so you and Ms. Artis and when was this	12	MS. HARROLD: Objection, relevance.
111:33:28	13	romantic involvement?	13	A. Yeah, I'm not sure where you're going. I'm
111::33:42	14	A. What do you mean by "when"?	14	sure it was in a house, but I don't know exactly th
111::33:29	15	Q. Was it you said it was you said	15	details.
111::33:85	16	Brittani is 29 years old. And that's currently, right?	16	Q. (By Ms. O'Driscoll) Okay. After that house,
111::33::87	17	A. Yeah. I think she is, yes.	17	did you you said that you-all had sex. Did you tall
11:33:52	18	Q. And was she born in was it 1987?	18	to her the next day?
111::33:96	19	A. Yes.	19	A. I don't remember. I'm not sure.
111:33:39	20	Q. And so does do you know when you were	20	Q. Well, do you remember talking to her after
111::34:02	21	romantically involved? Was it just prior to Brittani	21	that evening of the prom?
111::34:53	22	being born?	22	A. Oh, yeah.
111::34:59	23	A. It was in spring of that year, I guess. I	23	Q. And how often would you talk to her?
111:32:08	24	don't remember exactly.	24	A. When she told me she was pregnant.
111:32:00	25	Q. Okay. When you say "that year," would that	25	Q. Okay.
		19		21
111:32:08	1	be if she was was she born in March of 1987?	1	A. A few months later, couple of months later.
11:30:11	2	A. She was born in March of '87, so just	2	Q. Okay. And how did you respond?
11:34:15	3	previous, the previous year, a few months. So it was	3	A. I don't know. Like a 19-year-old. I don't
11:34:29	4	nine months. I don't remember the month. We can d	1	know.
111:34:29	5	the math. It was nine months before that. I don't	5	O. And what does that mean?
11:34:20	6	know.	6	A. A little scared, a little surprised, a little
111:32:28	7	Q. Okay. And do you remember I know you said	7	shocked. All of the above.
11:34:20	8	you went to the same high school and that you-all knew	8	Q. And before she called you to let you know she
11:30:32	9	some of the same people. But do you remember how you	i	was pregnant, had you spoken with her during that tin
11:34:36	10	met her, how you met Ms. Ellis, back during that spring	10	period?
111:34:36	11	time frame when you had the sexual encounter?	11	A. Huh-uh.
11:32:42	12	A. Are you asking me for an event or something?	12	Q. Okay.
11:32:39	13	Q. Well, how you met her. I'm just wondering,	13	A. I don't remember speaking to her.
11:32:39	14	did friends introduce you? Did you see her in the	14	Q. And did she call you? Or did you talk to her
D1:34:52	15	hallway? Do you remember?	15	in person when she told you that she was pregnant?
111:34:53	16	A. No, I don't. I think it was at a party or	16	A. I don't recall whether it was over the phone
DU:34:56	17	something. I'm not sure.	17	or not.
111:32:48	18	Q. Okay. You think you met her at a party?	18	Q. Did you-all have any mutual family friends?
111:38:02	19	A. I don't remember. I don't recall.	19	A. No. What do you mean by that?
11:38:63	20	Q. Okay.	20	Q. Well, were any of your family friends or
11:36:05	21	A. I have no idea where I met her.	21	anyone in your family friends with her family or fami
111:34:09	22	Q. Did you-all go to the prom together?	22	friends?
11:35:09	23	A. No. Actually, I went with someone else.	23	A. Oh, not that I know of.
	i		i	· · · · · · · · · · · · · · · · · · ·
HT:33:02	24	O. Okay. And do you remember it the sexual	1 64	O. And then once you found out that she was
N1:35:02 N1:35:09	24 25	Q. Okay. And do you remember if the sexual encounter with Ms. Artis was before, during or after	24 25	Q. And then once you found out that she was pregnant, you said you were a little scared as a

		22		24
11:35:08	1	19-year-old.	1	Brittani while she was growing up?
11:35:13	2	Did you have any discussions after that,	2	A. As often as I could.
11:35:14	3	finding out she was pregnant?	3	Q. Did you live close by?
11:39:15	4	A. Oh, yeah, the whole parent thing. I went	4	A. No, not close, no. I've always resided in
11:35:20	5	through all of that drama. It was, you know, a lot	5	Spring. I think they lived somewhere south of Houston.
11:35:27	6	going on, so	6	Q. And you lived in Spring during that time when
11:35:29	7	Q. Right. Okay. And when you say "the whole	7	Brittani was a child?
11:35:26	8	parent thing," what do you mean? Do you mean being a	8	A. Uh-huh.
11:35:28	9	parent with Ms. Ellis?	9	Q. Okay. And so Jacquelyn would go and pick up
11:35:29	10	A. No. Our parents. Her parents being upset,	10	Ms. Ellis [sic]. And during this while Brittani was
11:35:38	11	my parents being upset. Typical, "What are you doing		growing up, would you and Ms. Ellis talk frequently
11:35:31	12	What have you been doing?" type of I had to explain	12	about Brittani?
11:33:43	13		13	l e e e e e e e e e e e e e e e e e e e
	1	myself.		A. As parents would, I guess, whenever there's
11:35:45	14	Q. Okay. And then did you propose to Ms. Ellis?	14	issues, I guess.
11:35:48	15	A. No.	15	Q. And what types of issues would you talk
11:35:48	16	Q. Were there any discussions at all about	16	about?
11:35:49	17	getting married?	17	A. I don't know. Teenager issues, raising a kid
11:37:49	18	A. No.	18	issues, school, I guess.
11:38:00	19	Q. Did you talk to her throughout her pregnancy?	19	Q. Do you have specific recollections of having
11:38:86	20	A. I'm sure, yes.	20	those types of conversations with Ms. Ellis on a
11:38:69	21	Q. And were you there when her daughter when	21	regular basis?
11:38:09	22	your daughter was born?	22	A. I don't remember every moment. No, I don't
11:38:02	23	A. Yes.	23	have specific
11:36:03	24	Q. And did you help in raising Brittani?	24	Q. But you remember generally talking to her?
11:36:05	25	A. We co-parented, yes.	25	A. Uh-huh, yeah.
		23		25
11:36:08	1	Q. And when you say "co-parented," how did yo	1	Q. Regularly?
11:36:10	2	help in raising her together?	2	A. Co-parent, yes.
11:36:18	3	A. You know, guiding her, mentoring, feeding	3	Q. And you said that she lived with Ms. Ellis as
11:36:29	4	her, clothing her.	4	a child. Did sorry, that Brittani lived with her
11:36:25	5	Q. And so you were actively involved in her	5	mom as a child.
11:36:28	6	upbringing?	6	Did Brittani ever live with you?
11:36:29	7	A. Uh-huh.	7	A. After she graduated college.
11:36:29	. 8	Q. And where did Brittani live when she was a	8	Q. And do you remember how old or what year that
11:36:35	9	baby?	9	was or how old she was?
11:36:31	10	A. With her mom.	10	A. I think she graduated in I'm not sure when
11:36:33	11	Q. And would you go over and visit?	11	she graduated. '09, I guess. I'm not sure.
11:36:36	1.2	A. No, she was married. Ms. Ellis was married	12	Q. Okay. And was it during that time period
11:36:30	13	shortly after that and so and I had a girlfriend,	13	when you were working at ECFMG?
11:36:58	14	Jacquelyn.	14	A. No. I was actually I was in another
11:30:01	15	So my wife would pick her up from I	15	industry.
			16	
11:30:00	16	didn't visit, but I would get my daughter. I visited	0	<ul> <li>Q. Do you remember what year you started working</li> </ul>
11:30:00 11:30:02	16 17	didn't visit, but I would get my daughter. I visited with my daughter, yeah.	17	Q. Do you remember what year you started working at ECFMG?
	1			
11:30:02	17	with my daughter, yeah.  Q. So Jacquelyn would go and pick up your	17	at ECFMG?
11:30:02 11:30:00 11:30:00	17 18 19	with my daughter, yeah.	17 18	at ECFMG?  A. No. I think it's here somewhere (indicating). I don't remember exactly when.
11:30:02 11:30:06 11:30:06 11:30:56	17 18 19 20	with my daughter, yeah.  Q. So Jacquelyn would go and pick up your daughter?  A. Uh-huh.	17 18 19 20	at ECFMG?  A. No. I think it's here somewhere (indicating). I don't remember exactly when. Q. Okay. We'll look at some documents on that
11:30:02 11:30:06 11:30:06 11:30:56 11:30:52	17 18 19 20 21	with my daughter, yeah.  Q. So Jacquelyn would go and pick up your daughter?  A. Uh-huh.  Q. And where would she pick her up?	17 18 19 20 21	at ECFMG?  A. No. I think it's here somewhere (indicating). I don't remember exactly when.  Q. Okay. We'll look at some documents on that in a little bit.
11:30:88 11:30:86 11:30:86 11:30:56 11:30:52	17 18 19 20 21 22	with my daughter, yeah.  Q. So Jacquelyn would go and pick up your daughter?  A. Uh-huh.  Q. And where would she pick her up?  A. I'm sure from the house.	17 18 19 20 21 22	at ECFMG?  A. No. I think it's here somewhere (indicating). I don't remember exactly when.  Q. Okay. We'll look at some documents on that in a little bit.  A. Yeah.
11:30:08 11:30:06 11:30:56 11:30:56 11:30:52 11:36:59 11:39:02	17 18 19 20 21 22 23	with my daughter, yeah.  Q. So Jacquelyn would go and pick up your daughter?  A. Uh-huh.  Q. And where would she pick her up?  A. I'm sure from the house.  Q. From Ms. Artis Ellis' house?	17 18 19 20 21 22 23	at ECFMG?  A. No. I think it's here somewhere (indicating). I don't remember exactly when.  Q. Okay. We'll look at some documents on that in a little bit.  A. Yeah.  Q. But you remember Brittani living with you
11:30:88 11:30:86 11:30:86 11:30:56 11:30:52 11:36:59	17 18 19 20 21 22	with my daughter, yeah.  Q. So Jacquelyn would go and pick up your daughter?  A. Uh-huh.  Q. And where would she pick her up?  A. I'm sure from the house.	17 18 19 20 21 22	at ECFMG?  A. No. I think it's here somewhere (indicating). I don't remember exactly when.  Q. Okay. We'll look at some documents on that in a little bit.  A. Yeah.

		26		28
11:39:10	1	A. Uh-huh,	1	A. Oh, yes.
11:39:19	2	Q. And do you how long did she live with you	2	Q. Or Thanksgiving?
11:39:22	3	for?	3	A. (Moving head up and down.)
11:39:23	4	A. A couple of years. She lived with me, she	4	Q. And did you do you remember what your
11:39:36	5	moved out, she moved back in. So there was a perior	1 5	visitation was throughout Brittani growing up?
11:39:39	6	there, but I imagine it was a couple of years	6	A. Not specifically, no. Not exactly what it
11:39:28	7	altogether.	7	was.
11:39:28	8	Q. Okay. Did you help her pay her bills? Did	8	Q. Do you remember seeing her every week?
11:39:25	9	you strike that.	9	A. No, I didn't get a chance to see her every
11:39:28	10	Did you and Artis work out some sort of	10	week.
11:39:22	11	financial arrangement while Brittani was growing up?	11	Q. Every other week?
11:39:29	12	A. I paid child support.	12	A. I'm sure, at least.
11:39:32	13	Q. Did that come right out of your paycheck?	13	Q. And during the summers when she was on school
11:39:59	14	A. Uh-huh.	14	break?
11:40:88	15	Q. And did you pay that child support throughout	15	A. Uh-huh.
11:40:66	16	the entire time that Brittani was a child?	1.6	Q. Do you think you had a standard visitation
11:40:08	17	A. Absolutely.	17	where it was every 1st, 3rd and 5th weekend and
11:40:03	18	Q. Until she was 18?	18	summers.
11:40:08	19	A. Absolutely, yeah.	19	A. It probably was. Probably, yeah. I paid
11:40:09	20	Q. And did you continue to financially support	20	child support, so whatever the rule was.
11:40:52	21	Brittani after she was 18?	21	Q. Okay. Did you also carry Brittani on your
11:40:52	22	A. Uh-huh, yes.	22	medical insurance at any time when she was growing up?
11:40:57	23	Q. In what types of ways would you help her	23	A. Uh-huh.
11:40:18	24	financially?	24	Q. And your other children as well, Troi and
11:40:16	25	A. As she needed. She was in college, so just	25	Ervin, did they also live with you?
		27		29
11.40.00			2	
11:40:20	1	as a dad would.	1	A. Yes.
11:40:28	2	Q. Food?	2	Q. And did and prior to college did Brittani
11:40:22	3	A, Yeah.	3	live with you
11:40:29	4	Q. Cars?	4	A. No.
11:40:25	5	A. Yeah. All of that.	5	Q except for when she was visiting?
11:40:28	6	Q. Did you help with college tuition?	6	A. No.
11:40:20	7	A. No. Fortunately, she "scholarshipped" mo		Q. And related to the child support and custody,
11:40:36	8	of her education, so I was fortunate.	8	did you and Artis talk about what worked best for
11:42:40	9	Q. Okay.	9	you-all to decide how that was going to be handled?
11:40:33	10	A. Very little, if any, that I can recall.	10	MS. HARROLD: Objection, relevance.
11:40:35	11	Q. So you helped on the necessities?	11	Q. (By Ms. O'Driscoll) You can go ahead and
11:40:37	12	A. (Moving head up and down.)	12	answer.
11:40:38	13	Q. Did Brittani go on vacation with you and	13	A. I don't recall how that was decided. I'm
11:40:56	14	Jacquelyn?	14	sure we came to an agreement. We didn't have we
11:43:00	15	A. I'm sure she did.	15	didn't have problems, I guess. I'm trying to I
11:46:07	16	Q. Do you recall her going on vacation?	16	can't remember how that was done.
11:46:08	17	A. Yeah.	17	Q. So you never refused to pay child support?
11:46:49	18	Q. Did you did your family with Jacquelyn and		A. Oh, no, no.
11:48:88	19	Brittani, did you ever take any vacations together wit		Q. You wanted to be actively involved in her
11:46:88	20	Ms. Ellis?	20	life?
11:46:88	21	A. Oh, no. No.	21	A. Sure, yeah. She has my last name. Yeah.
11:43:02	22	Q. Did you-all ever celebrate did you ever	22	Q. Okay. And are you and Brittani close?
11:43:03	23	celebrate holidays with Brittani growing up as a child		A. I think so.
11:43:06	24	A. With my family, sure.	24	Q. And have you always been close?
11:48:08	25	Q. So she would come over for Christmas?	25	A. Yes.

8 (Pages 26 to 29)

	30		32
111::45::20	1 Q. While she was growing up, did you go to he	r 1	Q. From college?
1111::435::22	2 school functions?	2	A. Uh-huh.
111::45::23	3 A. Sure.	3	Q. And where did she go to college?
111::45::24	4 Q. Did you go to parent-teacher conferences?	4	A. University of Texas.
1111::435::370	5 A. I'm sure I did.	5	Q. And was that a four-year degree?
111::43::30	6 Q. And would you attend parent-teacher	6	A. Yes.
1111:435:32	7 conferences with Ms. Ellis?	7	Q. Did she go on to graduate school?
111::43::34	8 A. No.	8	A. Yes.
111::43::30	9 Q. You-all wouldn't be there talking to the	9	Q. And where did she go to graduate school?
1111::435::37	10 teacher?	10	A. Lamar University.
111::45:38	11 A. I don't ever recall that, no.	11	Q. Did you say "Lamar"?
111::415::41	12 Q. And throughout Brittani growing up, would	you 12	A. Lamar University, yeah.
111::45::53	13 talk to Ms. Ellis just on holidays; or was it more	13	Q. And has she graduated from Lamar?
111::43::50	14 frequently than that?	14	A. Yes.
111::45:58	15 A. I would say scasonally.	15	Q. Do you remember when she graduated?
11:46:00	16 Q. Okay.	16	A. No. I don't remember the year, no.
111::436::54	17 A. When we had to. You know, we were civil	1. 17	Q. Mr. Bryant, where do you currently work?
111::436::57	18 Q. Because you were co-parenting?	18	A. I work for Austin Industrial.
111::435::98	19 A. Right.	19	Q. And how long have you worked there?
111:446:02	Q. So if Brittani was sick, you would talk abou	20	A. Five years this October.
111::446::03	21 it?	21	Q. And what's your position there?
111::445::48	22 A. I don't know if I knew every time she was	22	A. I'm a HSE manager, health and safety manager
111::445:08	23 sick. I can't say that, no.	23	Q. And have you had that same position the whole
111::446::53	Q. Not every time; but, I mean, you knew what	24	entire time?
1111::445:: Б6	25 was going on in Brittani's life when she was at her	25	A. No. They hired me as a tech. I've been a
	31	L	33
11:47:03	1 mom's, correct?	1	manager the past four years.
11:47:08	2 A. I would like to think I knew, yeah.	2	Q. I'm sorry?
11:47:05	3 Q. Okay. Okay.	3	A. I've been a manager for the past four years.
11:44:02	4 Did Brittani get married recently?	4	They hired me as a tech before that.
11:47:40	5 A. Yes.	5	Q. Okay. And where did you work before Austin
11:47:20	6 Q. Was it within the last couple of years?	6	Industrial?
11:44:20	7 A. Yes. She's been married at least two years	7	A. ECFMG.
11:47:29	8 now.	8	Q. And how long did you work there?
11:44:20	9 Q. And were you involved in that wedding?	9	A. I'm not sure. I'm not sure if I was there
11:47:26	10 A. Yes.	10	two years or not. I'm not sure if I made it two years
11:44:50	11 Q. Did you help pay for the wedding?	11	Q. Do you remember how you came to work at
11:44:53	12 A. No.	12	ECFMG?
11:47:36	Q. Did you and your wife ever help Brittani buy	13	A. Vaguely, yes.
11:43:68	14 cars when she was growing up or as a young adult du	ring 14	Q. And how did you learn about that job?
11:49:68	15 college?	15	A. My wife was working there.
11:43:00	16 MS. HARROLD: Objection, relevance.	16	Q. And is that Jacquelyn?
11:43:08	17 Q. (By Ms. O'Driscoll) You can answer.	17	A. Yes.
11:43:08	18 A. I bought her a car.	18	Q. And how did you and what position did you
11:43:48	19 Q. And what kind of a car was that?	19	apply for?
11:45:48	20 A. A Honda.	20	A. It was standardized patient.
11:49:22	Q. Do you remember when that was?	21	Q. And you found out about that position through
11:49:28	22 A. Not exactly. After she for graduation	22	Jacquelyn?
11:43:28	23 from college. Close to that.	23	A. Uh-huh.
11:43:30	Q. It was a graduation present?	24	Q. Did you know do you remember how long
11:48:02	25 A. Uh-huh.	25	Jacquelyn had been working there

		34		36
111:48:02	1	A. No.	1	O. Okay. And did you understand that on the day
11:40:03	2	O at that time?	2	that you started that Ms. Ellis was the center manager?
11:48:09	3	A. Huh-uh, no.	3	A. I thought I worked under John. I thought I
11.:48:68	4	Q. But did you know that Ms. Ellis worked at	4	worked for John.
11:48:69	5	ECFMG?	5	Q. And how long do you think you worked for
11:48:69	6	A. Yes.	6	John?
11:49:10	7	Q. And how did you know that?	7	A. I don't know. I'm not sure. I know he
11:48:52	8	A. My wife worked there.	8	interviewed me. That's what I do remember. I am sure
11:50:04	9	Q. And your wife told you that?	9	about that.
11:50:08	10	A. Yeah.	10	Q. And how did you find out that you were going
11:50:06	11	O. But	11	to be interviewed at ECFMG?
11:50:07	12	A. Pretty sure. I mean	12	A. I'm not sure. Correspondence, maybe a phone
11:50:19	13	Q. And you also spoke with Ms. Ellis or texted	13	call or mail. I'm not sure how I found out I got the
11:50:28	14	with her on the holidays; so you knew where she worke	d, 14	interview.
11:40:24	15	didn't you?	15	Q. Had you met John before that interview? Had
11:50:29	16	A. I guess, yes. I guess that's how I knew,	16	you met him before?
111:40:20	17	yeah. I didn't keep track of her. Ms. Ellis, I mean.	17	A. I don't know. I don't know. I don't think
11:40:33	18	Q. Right, right. But you would communicate	18	so.
111:40:34	19	throughout the holidays and so you knew where she	19	Q. Did you ever and you said that Jacquelyn,
111:40:31	20	worked, didn't you?	20	your wife, work at ECFMG during that time when you
111:40:37	21	A. I can't say that I did. Before my wife	21	interviewed at ECFMG?
111:40:40	22	worked there, I can't say that I did, no.	22	A. Right.
111:49:48	23	Q. But you knew she worked there while your	23	Q. Had you ever gone to ECFMG functions
11:48:43	24	wife	24	A. I had, yes.
ПП:40:4В	25	A. Yes.	25	Q with Jacquelyn?
		35		37
11:58:42	1	MS, HARROLD: Objection, asked and	1	A. Yes.
11:98:42	2	answered.	2	Q. What kinds of functions did you go to?
11:98:44	3	Q. (By Ms. O'Driscoll) You knew Ms. Ellis	3	A. Like a Christmas party.
11:38:48	4	worked there during while Jacquelyn worked there?	4	Q. Any other functions?
11:98:50	5	A. Yes. Yes, I did.	5	A. That's the only thing I remember, a holiday
11:98:52	6	Q. And did you know what her position was? I'm	6	party or something.
11:98:56	7	sorry. Let me make sure that's clear.	7	Q. Any baseball games?
11:98:52	8	Did you know what Artis Ellis' position	8	A. Maybe. Maybe.
11:99:80	9	was at ECFMG while your work wife was working there?	9	Q. Okay.
11:99:85	1.0	A. I'm not sure if I did or not. I don't know	10	A. Yeah. I probably went to a baseball game,
11:90:08	11	if I knew what she did, or not.	11	yeah,
11:90:00	12	Q. Do you remember knowing that she ran the	12	Q. Okay. Do you remember how many functions you
11:99:00	13	center?	13	went to?
11:59:00	14	A. No, I wasn't sure she ran the center, no.	14	A. No.
11:99:08	15	Q. You found out that she ran the center when	15	Q. Okay. Do you remember, going to those
11:99:08	16	you were hired, correct?	16	functions, did you see Ms. Ellis at any of those
11:99:07	17	A. Well, actually, when I interviewed, I guess I	17	functions?
11:99:03	18	found she wasn't, like, running the center when I	18	A. Uh-huh.
11:99:09	19	was interviewed.	19	Q. Okay. Would Brittani ever go with you to
11:99:28	20	Q. Was she running the center when you started	20	those functions?
11:99:28	21	working there?	21	A. No.
11:99:29	22	A. No.	22	Q. Did would you and Ms. Ellis talk at those
11:99:39	23	Q. Are you sure about that?	23	functions?
11:99:39	24	A. Yeah. There was a guy named John. There was	1	A. Yes.
11:99:29	25	a guy named John running the center when I got there.	25	Q. Because you were co-parenting with Brittani?

		38		40
11:51:00	1	A. Right, right.	1	Q. What was the other job as well?
11:51:00	-2	Q. And do you remember you said that you	2	A. I was a financial rep for Met Life.
11:50:00	3	remember that John interviewed you for that position	. 3	Q. And was that also a part-time position, or
11:54:36	4	and that was for a standardized patient position?	4	was that full-time?
11:51:40	5	A. Uh-huh, yes.	5	A. No, it was full-time.
11:51:42	6	Q. Was that a part-time job?	6	Q. So you were working full-time for I'm
11:51:42	7	A. It was, yes.	7	sorry Met Life?
11:54:43	8	Q. Do you remember who trained you?	8	A. Uh-huh.
11:51:56	9	A. Kristy.	9	Q. And then you would work part-time over at
11:51:58	10	Q. Kristy Edens?	10	ECFMG?
11:54:59	11	A. Yes, yes.	11	A. Uh-huh.
11:51:58	12	Q. And do you remember do you remember havi	l	Q. You said that you remember John being there
11:52:03	13	to fill out a job application to apply for the job at	13	at some point towards the beginning. Do you remember
11:52:66	14	ECFMG?	14	him ever leaving and not being in Houston?
11:52:00	15	A. Sure.	15	A. Sure, uh-huh.
11:52:00	16	O. Was it did you fill out a hard copy one or	16	Q. And do you remember when he left?
11:52:42	17	went on-line or did you mail one in? How did you do	17	A. No.
11:52:43	18		1.8	Q. Do you know where he went?
11:52:43	19	that?  A. I'm not sure. I think they do it on-line.	19	A. I think he went to Philadelphia, back to
11:52:59	20	I'm not sure. I think I did it on line.	20	• '
11:52:33	1		1	Philadelphia.  Q. Okay. And is it your understanding that when
	21	Q. And did you apply for the job application	21	
11:52:28	22	before you went to work at ECFMG?	22	John left that Ms. Ellis became center manager?
11:53:06	23	A. Yeah, Uh-huh.	23	A. Right, right. That's what I yeah.
11:58:38	24	Q. And do you remember seeing Ms. Ellis when yo	!	Q. Before going to work at ECFMG do you remembe
11:59:39	25	started working at ECFMG?	25	having any conversations with Ms. Ellis about the
		39		41
111:52:89	1	A. Sure, yes, I saw her.	1	prospect of going to work there?
111::52:19	2	Q. And you knew she was center manager?	2	A. No, I don't remember any conversations like
111:52:24	3	A. At some point. But I don't think she was	3	that.
111:52:25	4	center manager when I got hired there. I mean, she ma	y 4	Q. You don't remember asking her anything about
111::52:26	5	have been; but I just remember working for John, so	5	
11:52:38		mare been, but I just remember working for bonn, som	3	the business or the job or what it was like to work
	6	Q. Okay. And do you remember who you reported	6	the business or the job or what it was like to work there, anything along those lines?
11:52:30	6 7		l	-
	1	Q. Okay. And do you remember who you reported	6	there, anything along those lines?
11:52:30	7	Q. Okay. And do you remember who you reported to when you were hired?	6 7	there, anything along those lines?  A. No. My wife I got all of that from my
11:52:30 11:52:38	7 8	Q. Okay. And do you remember who you reported to when you were hired?  A. As an SP, I reported to the trainers. That's	6 7 8	there, anything along those lines?  A. No. My wife I got all of that from my wife.
11:52:30 11:52:38 11:53:92	7 8 9	Q. Okay. And do you remember who you reported to when you were hired?  A. As an SP, I reported to the trainers. That's typically who I reported to.	6 7 8 9	there, anything along those lines?  A. No. My wife I got all of that from my wife.  Q. Okay. And do you remember how long Jacquelyn
11:52:30 11:52:38 11:53:92 11:53:99	7 8 9 10	Q. Okay. And do you remember who you reported to when you were hired?  A. As an SP, I reported to the trainers. That's typically who I reported to.  Q. Okay. Do you remember who did your job	6 7 8 9	there, anything along those lines?  A. No. My wife I got all of that from my wife.  Q. Okay. And do you remember how long Jacquelyr worked there?
11:59:30 11:52:38 11:55:92 11:55:95 11:55:96	7 8 9 10 11	Q. Okay. And do you remember who you reported to when you were hired?  A. As an SP, I reported to the trainers. That's typically who I reported to.  Q. Okay. Do you remember who did your job evaluations?	6 7 8 9 10	there, anything along those lines?  A. No. My wife I got all of that from my wife.  Q. Okay. And do you remember how long Jacquely worked there?  A. No. I'm not sure how long she worked there.
11:59:30 11:52:38 11:55:92 11:55:95 11:55:96	7 8 9 10 11 12	Q. Okay. And do you remember who you reported to when you were hired?  A. As an SP, I reported to the trainers. That's typically who I reported to.  Q. Okay. Do you remember who did your job evaluations?  A. I don't know that I had a job evaluation.	6 7 8 9 10 11 12	there, anything along those lines?  A. No. My wife I got all of that from my wife.  Q. Okay. And do you remember how long Jacquely worked there?  A. No. I'm not sure how long she worked there.  Q. But you-all worked there for some period of
11:52:38 11:52:38 11:53:82 11:55:95 11:55:49 11:55:49	7 8 9 10 11 12 13	Q. Okay. And do you remember who you reported to when you were hired?  A. As an SP, I reported to the trainers. That's typically who I reported to.  Q. Okay. Do you remember who did your job evaluations?  A. I don't know that I had a job evaluation.  Q. Do you remember if you ever received any	6 7 8 9 10 11 12 13	there, anything along those lines?  A. No. My wife I got all of that from my wife.  Q. Okay. And do you remember how long Jacquely worked there?  A. No. I'm not sure how long she worked there.  Q. But you-all worked there for some period of time at the same time?
11:52:38 11:52:38 11:55:82 11:55:89 11:55:49 11:55:49 11:55:49	7 8 9 10 11 12 13 14	Q. Okay. And do you remember who you reported to when you were hired?  A. As an SP, I reported to the trainers. That's typically who I reported to.  Q. Okay. Do you remember who did your job evaluations?  A. I don't know that I had a job evaluation.  Q. Do you remember if you ever received any raises while you worked at ECFMG?	6 7 8 9 10 11 12 13	there, anything along those lines?  A. No. My wife I got all of that from my wife.  Q. Okay. And do you remember how long Jacquely worked there?  A. No. I'm not sure how long she worked there.  Q. But you-all worked there for some period of time at the same time?  A. Uh-huh.
11:52:38 11:52:38 11:53:82 11:55:85 11:55:49 11:55:45 11:55:46 11:55:46	7 8 9 10 11 12 13 14 15	Q. Okay. And do you remember who you reported to when you were hired?  A. As an SP, I reported to the trainers. That's typically who I reported to.  Q. Okay. Do you remember who did your job evaluations?  A. I don't know that I had a job evaluation.  Q. Do you remember if you ever received any raises while you worked at ECFMG?  A. No, I don't. I don't think I got any raises.  Q. In that part-time position as an SP when you	6 7 8 9 10 11 12 13 14 15	there, anything along those lines?  A. No. My wife I got all of that from my wife.  Q. Okay. And do you remember how long Jacquely worked there?  A. No. I'm not sure how long she worked there.  Q. But you-all worked there for some period of time at the same time?  A. Uh-huh.  Q. So Jacquelyn was working at ECMFG the same time you were and the same time that Ms. Ellis was
11:52:38 11:52:38 11:53:82 11:55:85 11:55:46 11:55:46 11:55:46 11:55:48 11:55:48	7 8 9 10 11 12 13 14 15	Q. Okay. And do you remember who you reported to when you were hired?  A. As an SP, I reported to the trainers. That's typically who I reported to.  Q. Okay. Do you remember who did your job evaluations?  A. I don't know that I had a job evaluation.  Q. Do you remember if you ever received any raises while you worked at ECFMG?  A. No, I don't. I don't think I got any raises.  Q. In that part-time position as an SP when you were hired, how many hours a week would you open?	6 7 8 9 10 11 12 13 14 15 16	there, anything along those lines?  A. No. My wife I got all of that from my wife.  Q. Okay. And do you remember how long Jacquely worked there?  A. No. I'm not sure how long she worked there.  Q. But you-all worked there for some period of time at the same time?  A. Uh-huh.  Q. So Jacquelyn was working at ECMFG the same time you were and the same time that Ms. Ellis was center manager?
11:52:38 11:52:38 11:53:82 11:53:85 11:53:49 11:53:49 11:53:48 11:53:48 11:53:48 11:53:35	7 8 9 10 11 12 13 14 15 16 17	Q. Okay. And do you remember who you reported to when you were hired?  A. As an SP, I reported to the trainers. That's typically who I reported to.  Q. Okay. Do you remember who did your job evaluations?  A. I don't know that I had a job evaluation.  Q. Do you remember if you ever received any raises while you worked at ECFMG?  A. No, I don't. I don't think I got any raises.  Q. In that part-time position as an SP when you were hired, how many hours a week would you open?  A. I don't know. Around 20 hours a week, I	6 7 8 9 10 11 12 13 14 15 16 17	there, anything along those lines?  A. No. My wife I got all of that from my wife.  Q. Okay. And do you remember how long Jacquely worked there?  A. No. I'm not sure how long she worked there.  Q. But you-all worked there for some period of time at the same time?  A. Uh-huh.  Q. So Jacquelyn was working at ECMFG the same time you were and the same time that Ms. Ellis was center manager?  A. Yes.
11:52:38 11:52:38 11:53:95 11:55:95 11:55:49 11:53:46 11:53:46 11:53:46 11:53:35 11:53:36	7 8 9 10 11 12 13 14 15 16 17 18	Q. Okay. And do you remember who you reported to when you were hired?  A. As an SP, I reported to the trainers. That's typically who I reported to.  Q. Okay. Do you remember who did your job evaluations?  A. I don't know that I had a job evaluation.  Q. Do you remember if you ever received any raises while you worked at ECFMG?  A. No, I don't. I don't think I got any raises.  Q. In that part-time position as an SP when you were hired, how many hours a week would you open?  A. I don't know. Around 20 hours a week, I guess.	6 7 8 9 10 11 12 13 14 15 16 17 18	there, anything along those lines?  A. No. My wife I got all of that from my wife.  Q. Okay. And do you remember how long Jacquelyr worked there?  A. No. I'm not sure how long she worked there.  Q. But you-all worked there for some period of time at the same time?  A. Uh-huh.  Q. So Jacquelyn was working at ECMFG the same time you were and the same time that Ms. Ellis was center manager?  A. Yes.  Q. And did Jacquelyn get along with Ms. Ellis?
11:52:38 11:52:38 11:53:95 11:53:95 11:53:49 11:53:46 11:53:46 11:53:48 11:53:35 11:53:36 11:53:36 11:53:36	7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. Okay. And do you remember who you reported to when you were hired?  A. As an SP, I reported to the trainers. That's typically who I reported to.  Q. Okay. Do you remember who did your job evaluations?  A. I don't know that I had a job evaluation.  Q. Do you remember if you ever received any raises while you worked at ECFMG?  A. No, I don't. I don't think I got any raises.  Q. In that part-time position as an SP when you were hired, how many hours a week would you open?  A. I don't know. Around 20 hours a week, I guess.  Q. And did you have any benefits with that	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	there, anything along those lines?  A. No. My wife I got all of that from my wife.  Q. Okay. And do you remember how long Jacquely worked there?  A. No. I'm not sure how long she worked there.  Q. But you-all worked there for some period of time at the same time?  A. Uh-huh.  Q. So Jacquelyn was working at ECMFG the same time you were and the same time that Ms. Ellis was center manager?  A. Yes.  Q. And did Jacquelyn get along with Ms. Ellis?  A. Yeah, I think so.
11:59:38 11:59:38 11:55:89 11:55:49 11:55:49 11:55:48 11:55:48 11:55:36 11:55:36 11:55:36 11:55:36 11:55:36	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Okay. And do you remember who you reported to when you were hired?  A. As an SP, I reported to the trainers. That's typically who I reported to.  Q. Okay. Do you remember who did your job evaluations?  A. I don't know that I had a job evaluation.  Q. Do you remember if you ever received any raises while you worked at ECFMG?  A. No, I don't. I don't think I got any raises.  Q. In that part-time position as an SP when you were hired, how many hours a week would you open?  A. I don't know. Around 20 hours a week, I guess.  Q. And did you have any benefits with that position as an SP?	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	there, anything along those lines?  A. No. My wife I got all of that from my wife.  Q. Okay. And do you remember how long Jacquelyr worked there?  A. No. I'm not sure how long she worked there.  Q. But you-all worked there for some period of time at the same time?  A. Uh-huh.  Q. So Jacquelyn was working at ECMFG the same time you were and the same time that Ms. Ellis was center manager?  A. Yes.  Q. And did Jacquelyn get along with Ms. Ellis?  A. Yeah, I think so.  Q. I mean, was there any animosity
11:52:38 11:52:38 11:53:85 11:53:85 11:53:49 11:53:43 11:53:46 11:53:46 11:53:46 11:53:36 11:53:36 11:53:36 11:53:36 11:53:39 11:56:40 11:56:40	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Okay. And do you remember who you reported to when you were hired?  A. As an SP, I reported to the trainers. That's typically who I reported to.  Q. Okay. Do you remember who did your job evaluations?  A. I don't know that I had a job evaluation.  Q. Do you remember if you ever received any raises while you worked at ECFMG?  A. No, I don't. I don't think I got any raises.  Q. In that part-time position as an SP when you were hired, how many hours a week would you open?  A. I don't know. Around 20 hours a week, I guess.  Q. And did you have any benefits with that position as an SP?  A. No. I don't think I had benefits. I had	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	there, anything along those lines?  A. No. My wife I got all of that from my wife.  Q. Okay. And do you remember how long Jacquely worked there?  A. No. I'm not sure how long she worked there.  Q. But you-all worked there for some period of time at the same time?  A. Uh-huh.  Q. So Jacquelyn was working at ECMFG the same time you were and the same time that Ms. Ellis was center manager?  A. Yes.  Q. And did Jacquelyn get along with Ms. Ellis?  A. Yeah, I think so.  Q. I mean, was there any animosity  A. No.
11:52:38 11:52:38 11:53:39 11:55:85 11:53:49 11:53:46 11:53:46 11:53:46 11:53:46 11:53:36 11:53:36 11:55:58 11:55:58 11:55:58 11:55:58 11:55:58	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Okay. And do you remember who you reported to when you were hired?  A. As an SP, I reported to the trainers. That's typically who I reported to.  Q. Okay. Do you remember who did your job evaluations?  A. I don't know that I had a job evaluation.  Q. Do you remember if you ever received any raises while you worked at ECFMG?  A. No, I don't. I don't think I got any raises.  Q. In that part-time position as an SP when you were hired, how many hours a week would you open?  A. I don't know. Around 20 hours a week, I guess.  Q. And did you have any benefits with that position as an SP?  A. No, I don't think I had benefits. I had benefits somewhere else at another job at the time.	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	there, anything along those lines?  A. No. My wife I got all of that from my wife.  Q. Okay. And do you remember how long Jacquely worked there?  A. No. I'm not sure how long she worked there.  Q. But you-all worked there for some period of time at the same time?  A. Uh-huh.  Q. So Jacquelyn was working at ECMFG the same time you were and the same time that Ms. Ellis was center manager?  A. Yes.  Q. And did Jacquelyn get along with Ms. Ellis?  A. Yeah, I think so.  Q. I mean, was there any animosity  A. No.  Q since you and Ms. Ellis were co-parenting
11:52:38 11:52:38 11:53:85 11:53:85 11:53:49 11:53:43 11:53:46 11:53:46 11:53:46 11:53:36 11:53:36 11:53:36 11:53:36 11:53:39 11:56:40 11:56:40	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Okay. And do you remember who you reported to when you were hired?  A. As an SP, I reported to the trainers. That's typically who I reported to.  Q. Okay. Do you remember who did your job evaluations?  A. I don't know that I had a job evaluation.  Q. Do you remember if you ever received any raises while you worked at ECFMG?  A. No, I don't. I don't think I got any raises.  Q. In that part-time position as an SP when you were hired, how many hours a week would you open?  A. I don't know. Around 20 hours a week, I guess.  Q. And did you have any benefits with that position as an SP?  A. No. I don't think I had benefits. I had	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	there, anything along those lines?  A. No. My wife I got all of that from my wife.  Q. Okay. And do you remember how long Jacquely worked there?  A. No. I'm not sure how long she worked there.  Q. But you-all worked there for some period of time at the same time?  A. Uh-huh.  Q. So Jacquelyn was working at ECMFG the same time you were and the same time that Ms. Ellis was center manager?  A. Yes.  Q. And did Jacquelyn get along with Ms. Ellis?  A. Yeah, I think so.  Q. I mean, was there any animosity  A. No.

12:58:32 15 Q. You said Ms. Ellis and Jacquelyn got along 15 Ms. Ellis shared a daughter? 16 very well while Brittani was growing up as well? 17 A. Not always, but we eventually got there. 17 Q. Did you tell Mr. Biggs that? 18 Q. Okay. Do you remember any 18 A. No. 12:58:37 19 specific anything specific that you're thinking of 19 Q. Do you ever remember telling any of your 12:58:38 20 when you say "we eventually got there"? 21 A. No. Just you know, we were young. We 22 A. No. 12:58:38 23 Were all pretty young. So it was it wasn't perfect, 24 Q. Do you remember Brittani ever going to any			42		44
11.259.28   2   A. Yes.   2   A. Yes.   2   A. Yes.   2   A. Yes.   2   B. Tills 96.28   A. Could you ask me that again?   5   A. Wes. Did Jacquelyn, your wife, Jacquelyn, know   5   A. Yes.   6	111 = 58 = 63	1	O. So everyone got along?	1	O Okay But you-all got along well?
11.256.10   3   Q. Do you know if your wife, Lacquelyn, knew   18.256.250   4   Ms. Ellis before going to work at ECFMG?   5   A. Could you ask me that again?   5   A. Could you ask me that again?   7   Ms. Ellis before she went to go work at ECFMG?   18.256.250   18.256.250   19   Q. Sure. Did Jacquelyn, your wife, know   18.256.250   18.256.250   10   A. She is the mother of my daughter. We were   18.256.231   10   Co-parenting.   10   Q. And how did she know her?   18.256.231   10   Co-parenting.   10   Q. And how did she know her?   11.256.231   11   Co-parenting.   12   Q. Right. So Jacquelyn is your daughter's   13   Stepnom?   13   Stepnom?   14   A. Yes.   14   Q. And Jacquelyn knew Artis Ellis because   15   Q. And Jacquelyn knew Artis Ellis because   15   Voall were raising Brittan ingesher?   17   A. Yes.   18   U. Fall and the provided when Ms. Ellis was pregnant with Brittani. Was that   18.566.230		l			
Ill:59:13   A. Could you ask me that again?   A. Colid you apply for?   A. Colid you		i	· ·		
11.156.15   5   A. Could you ask me that again?   5   A. (Moving head up and down.)   11.156.25   7   Ms. Ellis before she went to go work at ECFMG?   11.156.25   7   Ms. Ellis before she went to go work at ECFMG?   11.156.25   7   Ms. Ellis before she went to go work at ECFMG?   11.156.25   7   Ms. Ellis before she went to go work at ECFMG?   11.156.25   7   A. Yes.   10.   Q. And what promotion did you apply for?   A. Nes. I did. Q. And what promotion did you apply for?   A. Trainer.   11.156.23   12   Q. Right. So Jacquelyn is your daughter's   12   Q. What was the process of applying? What did you have to do to apply for the trainer position?   A. Yes.   11.156.23   15   Q. And Jacquelyn knew Artis Ellis because   15   You and user raining Brittani together?   16   When Ms. Ellis was pregnant with Brittani. Was that   11.156.28   17   The When Ms. Ellis was pregnant with Brittani. Was that   11.156.29   20   think you said you were dating during that time period when Ms. Ellis was pregnant with Brittani. Was that   11.156.29   21   think you said you were dating during that time period   18   When Ms. Ellis was pregnant with Brittani was really small, so like a few   11.156.29   22   Jackie – Brittani was really small, so like a few   11.156.29   23   A. She was born – I started dating   23   Line Pristani was really small, so like a few   11.156.29   24   Jackie – Brittani was really small, so like a few   11.156.29   24   Jackie – Brittani was really small, so like a few   11.156.29   25   months, so   25   Q. Okay. And do you remember any of the names of the promotion of the promotion of the pristani vas really small, so like a few   15   A. No. A lot.   Q. Do you remember any of the names of the promotion of the pr		l			
III.559.28   6   Q. Sure. Did Jacquelyn, your wife, know   5   Q. Do you remember ever applying for a promoti from the SP position?   7   Ms. Ellis before she went to go work at ECFMG?   7   7   Ms. Ellis before she went to go work at ECFMG?   7   7   Ms. Ellis before she went to go work at ECFMG?   7   7   Ms. Ellis before she went to go work at ECFMG?   7   7   Ms. Ellis she fore she went to go work at ECFMG?   7   7   Ms. Ellis the fore of my daughter. We were considered as the she was pregnant with Britain in the profit of the she was pregnant, but I know I introduced Britani was really small, so like a few months, or something like that.   1   More with the she was pregnant, but I know I introduced Britani to Jacquelyn when she was really small, so like a few months, or something like that.   2   Q. Do you remember ever applying for a promoti from the SP position?   4   A. Yes.   4   A. Wes.		l			
Ill_59c_22   7   Ms. Ellis before she went to go work at ECFMG?   7   1   1   1   1   1   1   1   1   1		ı			
Ill 159-29   8   A. Yes.   8   A. Yes.   8   Q. And how did she know her?   9   Q. And how did she know her?   10   A. She is the mother of my daughter. We were co-parenting.   11   Q. Right. So Jacquelyn is your daughter's   12   Q. And did you apply for?   12   A. Yes.   13   Stepmom?   13   Q. Might. So Jacquelyn is your daughter's   14   A. Yes.   14   Q. Mad did you apply for the trainer position?   15   Q. And Jacquelyn knew Artis Ellis because   16   you have to do to apply for the trainer position?   18   You have to do to apply for the trainer position?   18   You have to do to apply for the trainer position?   18   You said you were dating during that time period of time they stuff.   18   You have to do to apply for the trainer position?   18   You have to do to apply		ì	1		
Ill		1	. 1		
III_556_30		1			1
1159-13		1	1		
III_59c_33   12   Q. Right. So Jacquelyn is your daughter's   12   A. Yes.     III_59c_38   14   A. Yes.   14   You have to do to apply for the trainer position?     III_59c_38   15   Q. And Jacquelyn knew Artis Ellis because   15   A. So I'm not sure of their process, but I think you apply on-line. I sent in a resume, all of that stuff.     III_59c_38   17   A. Yes.   17   Think you said you were dating during that time period   18   You had been without the period   19   Think you said you were dating during that time period   19   Think you said you had a girlfriend, but I wasn't scheduled the interviews in Houston, a lady from Philadelphia came through and did interviews, and sometime after that I was told I got the position.   22   You wantly you had you had a girlfriend, but I wasn't   22   You wantly wa		ì	1		
III.:50-35   13   stepmom?   14   A. Yes.   14   A. Yes.   15   C. And Jacquelyn knew Artis Ellis because   15   A. So I'm not sur fitter prosition?   16   you have to do to apply for the trainer position?   17   A. Yes.   17   Stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of that stuff.   18   You apply on-line. I sent in a resume, all of t		1			
III_55-39   14   A. Yes.   15   Q. And Jacquelyn knew Artis Ellis because   15   D. As of I'm not sure of their process, but I think you said you were dating during that time period   16   D. As of I'm not sure of their process, but I think you said you were dating during that time period   18   D. A. Yes.   17   A. Yes.   18   D. You and Jacquelyn — I know you said — 18   And then, over some period of time they when Ms. Ellis was pregnant with Brittani. Was that   20   When Ms. Ellis was pregnant with Brittani. Was that   21   III_55-69\$   22   Sure.   22   Sure.   22   Sure.   22   Sure.   23   A. She was born — I started dating   23   D. A. She was born — I started dating   24   III_55-59\$   25   Mot while she was pregnant, but I know I   11   Introduced Brittani was really small, so like a few   18   Introduced Brittani was really small, so like a few   18   Introduced Brittani was pregnant, but I know I   18   D. Do you remember how many folks?   45   D. Do you remember how many folks?   45   D. Do you remember any of the names of the people that were interviewing for that promotion?   45   A. No. A lot.   45   A. No.   45		l			i di
III_350_28		1	1		
Ill #59c#3   16   you-all were raising Brittani together?   17   A. Yes.   18   C. You and Jacquelyn —I know you said —I   18   18   And then, over some period of time they when Ms. Ellis was pregnant with Brittani. Was that Ill #59c#3   21   right? Or you said you had a girlfriend, but I wasn't yerfect. It wasn't perfect. It wasn't a perfect. It wasn't a perfect. It wasn't perfect. It wasn't perfect. It wasn't perfect. It wasn't a price in the sum on the proper interview on some time interview and promotion? In the time were added, yes and in the promotion? In the time were interview in Houston, a lady from Philly. In the time were interviews in Houston, a lady from Philly philadelpha came through and did interviews, and sometime after that I wasn't perfect. It wasn't a perfect. I		ł			•
Ill=550=287   17   A. Yes.   18   Q. You and Jacquelyn — I know you said — I 19   Ill=550=28   19   think you said you were dating during that time period 19   scheduled the interviews in Houston, a lady from when Ms. Ellis was pregnant with Brittani. Was that right? Or you said you had a girlfriend, but I wasn't 122   22   Q. Okay. And oyou remember if there were were Ill=550=39   23   A. She was born — I started dating   23   thirt oduced Brittani was really small, so like a few months, so   43   A. No. A lot.   Q. Do you remember how many folks?   45   Ill=59:55   3   small, like within a couple of months, two or three months, or something like that.   Q. Do you remember any of the names of the sacroscape of the sa		i			_
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11   150   20   20   20   20   20   20   20		1			
Ill = 50 = 48		Į.			- 1
Ill		!			
III :: 59 : 37   22   Surc.   23   A. She was born I started dating   23   A. She was born I started dating   24   A. Uh-huh.   25   O. Do you remember how many folks?		1			
11.59:37   23		1			
11.579:57		1	Ì		
11.:59:EQ   25   months, so   25   Q. Do you remember how many folks?   45     1		1	_		
### 13 ***  ### 13 ***  ### 13 ***  ### 14 ***  ### 14 ***  ### 15 ***  ### 12		1			1
11:59:52 1 Not while she was pregnant, but I know I 12:59:39 3 small, like within a couple of months, two or three 3 people that were interviewing for that promotion? 11:59:39 4 months, or something like that. 4 A. No. 12:50:06 5 Q. So Brittani grew up with her 12:00:04 6 A. Yes, yes. 6 Someone from who came in from Philly. 11:57:28 7 Q as a stepmom? 12:50:28 8 A. Yes, always. Even when we dated, yes. 12:50:28 9 Q. And how long did you and Jacquelyn date 12:50:28 10 before getting married? 10 A. After I got through that, I interviewed with 12:50:38 11 A. A year or two. 12:50:38 12:50:38 13 really well while growing up? 14 A. Uh-huh. Yes, yes. 15 Q. You said Ms. Ellis and Jacquelyn got along 15 Ms. Ellis shared a daughter? 16 A. No. 17 A. No. 18 Q. Did you interview with anyone else for that promotion? 18 A. After I got through that, I interviewed with 19 Artis and Brent. 19 Q. And did Jacquelyn and Brittani get along 10 A. Yes. 10 A. Yes. 11 A. Uh-huh. Yes, yes. 12:50:38 12 Q. You said Ms. Ellis and Jacquelyn got along 13 A. Yes. 14 A. Uh-huh. Yes, yes. 15 Q. You said Ms. Ellis and Jacquelyn got along 15 Ms. Ellis shared a daughter? 16 A. No. 17 A. No. 18 A. No. 18 A. No. 18 A. No. 19 Do you ever remember telling any of your co-workers that Brittani was your daughter? 18 A. No. 18 Q. Do you ever remember telling any of your co-workers that Brittani was your daughter? 18 A. No. 18 A. No. 18 C. Do you ever remember Brittani ever going to any but nothing I don't remember any events or anything 18 A. No. 18 C. Firstmas parties during the time when you worked the at ECFMG?	TITHOBEDG	25		25	
Darbotto   2   introduced Brittani to Jacquelyn when she was really   3   small, like within a couple of months, two or three   3   people that were interviewing for that promotion?   11:59:39   4   months, or something like that.   4   A. No.   Darbotto   2.00:04   6   A. Yes, yes.   6   someone from who came in from Philly.   11:57:28   7   Q as a stepmom?   7   A. Yes.   Q. Do you you remember interviewing with someone from who came in from Philly.   11:57:28   7   Q as a stepmom?   7   A. Yes.   Q. Did you interview with anyone else for that   Darbotto   25:50:38   10   before getting married?   10   A. After I got through that, I interviewed with   A. A year or two.   11   Artis and Brent.   Darbotto   25:50:38   12   Q. And did Jacquelyn and Brittani get along   12   Q. Brent Biggs?   13   A. Yes.   14   A. Uh-huh. Yes, yes.   14   Q. And did you tell anyone at ECFMG that you an   Darbotto   15   Q. You said Ms. Ellis and Jacquelyn got along   15   Q. You said Ms. Ellis and Jacquelyn got along   15   Q. You said Ms. Ellis shared a daughter?   16   A. No.   Darbotto   20   Do you ever remember telling any of your   20   Co-workers that Brittani was your daughter?   20   Co-workers that Brittani was your daughter?   20   Co-workers that Brittani was your daughter?   20   Co-workers that Brittani ever going to any   21   Christmas parties during the time when you worked the   Darbotto   24   It just wasn't perfect.   It wasn't a perfect   24   It just wasn't perfect.   It wasn't a perfect   24   It just wasn't perfect.   It wasn't a perfect   25   Co-workers that ECFMG?   Christmas parties during the time when you worked the   Darbotto   24   It just wasn't perfect.   It wasn't a perfect   25   Co-workers that ECFMG?   Christmas parties during the time when you worked the   Darbotto   25   Christmas parties during the time when you worked the   Darbotto   25   Christmas parties during the time when you worked the   Darbotto   25   Christmas parties during the time when you worked the   Dar		İ	į		45
### 3 small, like within a couple of months, two or three ### 3 people that were interviewing for that promotion?  #### 4 months, or something like that.  ### 4 A. No.  ### 2:50:06	111:59:53	1	Not while she was pregnant, but I know I	1	A. No. A lot.
### Billis shared a daughter?  ### A. No.  ### A. Yes, Q. Do you you remember interviewing with someone from who came in from Philly.  ### A. Yes,  ### A. A Yes,  ### A. Uh-huh. Yes, yes.  ### A. No.  ###	12:50:06	2	introduced Brittani to Jacquelyn when she was really	2	Q. Do you remember any of the names of the
D2:507:06  5 Q. So Brittani grew up with her 12:00:04  6 A. Yes, yes.  7 Q as a stepmom?  8 A. Yes, always. Even when we dated, yes.  9 Q. And how long did you and Jacquelyn date  10 before getting married?  11 A. A year or two.  12:507:38  12 Q. And did Jacquelyn and Brittani get along  13 really well while growing up?  14 A. Uh-huh. Yes, yes.  15 Q. Do you you remember interviewing with 16 someone from who came in from Philly.  7 A. Yes.  Q. Did you interview with anyone else for that promotion?  1 A. After I got through that, I interviewed with 1 Artis and Brent.  1 Q. And did Jacquelyn and Brittani get along 1 Q. Brent Biggs?  1 A. Yes.  1 Q. And did you tell anyone at ECFMG that you an 1 A. Yes.  1 Q. And did you tell anyone at ECFMG that you an 1 Ms. Ellis shared a daughter?  1 A. No.  1 D2:50:38  1 A. No.  1 A. No.  1 A. No.  1 D2:50:38  1 A. No.  2 Do you ever remember interviewing with 2 someone from who came in from Philly.  7 A. Yes.  Q. Did you interview with anyone else for that promotion?  1 A. After I got through that, I interviewed with Artis and Brent.  1 Q. Brent Biggs?  1 A. Yes.  Q. And did you tell anyone at ECFMG that you an 1 Ms. Ellis shared a daughter?  4 No.  1 D2:50:38  1 A. No.  1 D2:50:38  1 A. No.  1 D2:50:38  2 Okay. Do you remember any 1 A. No.  2 Do you ever remember telling any of your 2 co-workers that Brittani was your daughter?  2 Ocworkers that Brittani was your daughter?  2 Ocworkers that Brittani was your daughter?  2 Ocworkers that Brittani ever going to any 2 On you remember Brittani ever going to any 2 On you remember Brittani ever going to any 2 On you remember Brittani ever going to any 3 Orbitamas parties during the time when you worked the 3 Orbitamas parties during the time when you worked the 3 orbitanian and promotion?  2 On by our remember Brittanian was pour worked the 3 orbitanian and promotion?  3 On you remember Brittani ever going to any 3 Orbitamas parties during the time when you worked the 3 orbitanian and promotion?  4 On you remember a	11:59:59	3 .	small, like within a couple of months, two or three	3	people that were interviewing for that promotion?
12:00:04 6 A. Yes, yes. 6 someone from who came in from Philly.  11:57:28 7 Q as a stepmom? 7 A. Yes.  12:50:28 8 A. Yes, always. Even when we dated, yes. 8 Q. Did you interview with anyone else for that promotion?  12:50:38 9 Q. And how long did you and Jacquelyn date 9 promotion?  12:50:38 10 before getting married? 10 A. After I got through that, I interviewed with Artis and Brent.  12:50:38 11 A. A year or two. 11 Artis and Brent.  12:50:38 12 Q. Brent Biggs?  12:50:38 13 really well while growing up? 13 A. Yes.  12:50:80:98 14 A. Uh-huh. Yes, yes. 14 Q. And did you tell anyone at ECFMG that you an Brittani was growing up as well? 15 Q. You said Ms. Ellis and Jacquelyn got along 15 Ms. Ellis shared a daughter?  12:50:38 17 A. Not always, but we eventually got there. 17 Q. Did you tell Mr. Biggs that?  12:50:38 17 A. Not always, but we eventually got there. 18 Q. Okay. Do you remember any 18 A. No. 19 you even remember telling any of your when you say "we eventually got there"? 19 Q. Do you ever remember telling any of your when you say "we eventually got there"? 20 co-workers that Brittani was your daughter?  12:50:38 22 were all pretty young. So it was it wasn't perfect, 19 Q. Do you remember Brittani ever going to any 12:50:39 24 It just wasn't perfect. It wasn't a perfect 19 Q. This times parties during the time when you worked the gast of the product of the pro	111:59:39	4	months, or something like that.	4	A. No.
11:57:28 7 Q as a stepmom? 7 A. Yes.  12:60:28 8 A. Yes, always. Even when we dated, yes. 12:60:38 9 Q. And how long did you and Jacquelyn date 10 before getting married? 11 A. A year or two. 12:50:38 12 Q. And did Jacquelyn and Brittani get along 13 really well while growing up? 14 A. Uh-huh. Yes, yes. 15 Q. You said Ms. Ellis and Jacquelyn got along 16:50:38 17 A. Ves. 18 Q. Did you interview with anyone else for that 19 promotion? 10 A. After I got through that, I interviewed with 11 Artis and Brent. 12 Q. Brent Biggs? 13 A. Yes. 14 Q. And did you tell anyone at ECFMG that you and 12:50:38 14 A. Uh-huh. Yes, yes. 15 Q. You said Ms. Ellis and Jacquelyn got along 15 Ms. Ellis shared a daughter? 16 A. No. 18:50:38 17 A. Not always, but we eventually got there. 17 Q. Did you tell Mr. Biggs that? 18 Q. Okay. Do you remember any 18 A. No. 19:50:38 19 Specific anything specific that you're thinking of 19 Q. Do you ever remember telling any of your 18:50:38 20 When you say "we eventually got there"? 21 Co-workers that Brittani was your daughter? 22 Co-workers that Brittani was your daughter? 23 Christmas parties during the time when you worked the 18:50:38 24 It just wasn't perfect. It wasn't a perfect 24 at ECFMG?	12:50:06	5	Q. So Brittani grew up with her	5	
### B2:50:20   8 A. Yes, always. Even when we dated, yes. ### 9 Q. And how long did you and Jacquelyn date ### 9 Promotion?  ### D2:50:38	12:00:04	6	A. Yes, yes.	6	someone from who came in from Philly.
B2:60:3849Q. And how long did you and Jacquelyn date9promotion?B2:60:38610before getting married?10A. After I got through that, I interviewed withB2:60:38411A. A year or two.11Artis and Brent.B2:60:2812Q. And did Jacquelyn and Brittani get along12Q. Brent Biggs?B2:60:29313really well while growing up?13A. Yes.B2:60:29314A. Uh-huh. Yes, yes.14Q. And did you tell anyone at ECFMG that you anB2:60:39215Q. You said Ms. Ellis and Jacquelyn got along15Ms. Ellis shared a daughter?B2:60:39216very well while Brittani was growing up as well?16A. No.B2:60:38217A. Not always, but we eventually got there.17Q. Did you tell Mr. Biggs that?B2:60:383718Q. Okay. Do you remember any18A. No.B2:60:38419specific anything specific that you're thinking of19Q. Do you ever remember telling any of yourB2:60:38420when you say "we eventually got there"?20co-workers that Brittani was your daughter?B2:60:38522were all pretty young. So it was it wasn't perfect,22Q. Do you remember Brittani ever going to anyB2:60:38624It just wasn't perfect. It wasn't a perfect24at ECFMG?	11:57:28	7	Q as a stepmom?	7	A. Yes.
D2:50:38 10 before getting married? 10 A. After I got through that, I interviewed with D2:50:38 11 A. A year or two. 11 Artis and Brent. 12:50:38 12 Q. And did Jacquelyn and Brittani get along 12 Q. Brent Biggs? 13 really well while growing up? 13 A. Yes. 14 Q. And did you tell anyone at ECFMG that you an D2:50:38 15 Q. You said Ms. Ellis and Jacquelyn got along 15 Ms. Ellis shared a daughter? 16 Very well while Brittani was growing up as well? 16 A. No. 12:50:38 17 A. Not always, but we eventually got there. 17 Q. Did you tell Mr. Biggs that? 18 Q. Okay. Do you remember any 18 A. No. 12:50:30 19 specific anything specific that you're thinking of 19 Q. Do you ever remember telling any of your 12:50:30 20 When you say "we eventually got there"? 20 co-workers that Brittani was your daughter? 12:50:30 21 A. No. Just you know, we were young. We 12:50:30 22 were all pretty young. So it was it wasn't perfect, 22 Q. Do you remember Brittani ever going to any 12:50:30 24 It just wasn't perfect. It wasn't a perfect 24 at ECFMG?	112:50:20	8	A. Yes, always. Even when we dated, yes.	8	Q. Did you interview with anyone else for that
D2:50:3811A. A year or two.11Artis and Brent.D2:50:2812Q. And did Jacquelyn and Brittani get along12Q. Brent Biggs?D2:58:2813really well while growing up?13A. Yes.D2:58:2814A. Uh-huh. Yes, yes.14Q. And did you tell anyone at ECFMG that you an D2:56:32D2:56:3215Q. You said Ms. Ellis and Jacquelyn got along15Ms. Ellis shared a daughter?D2:56:3816very well while Brittani was growing up as well?16A. No.D2:56:3817A. Not always, but we eventually got there.17Q. Did you tell Mr. Biggs that?D2:56:3718Q. Okay. Do you remember any18A. No.D2:56:3019specific anything specific that you're thinking of19Q. Do you ever remember telling any of yourD2:56:3220when you say "we eventually got there"?20co-workers that Brittani was your daughter?D2:56:3221A. No. Just you know, we were young. We21A. No.D2:56:3222were all pretty young. So it was it wasn't perfect,22Q. Do you remember Brittani ever going to anyD2:56:3223but nothing I don't remember any events or anything23Christmas parties during the time when you worked the at ECFMG?	112:50:34	9	<ul> <li>Q. And how long did you and Jacquelyn date</li> </ul>	9	*
B2:60:3812Q. And did Jacquelyn and Brittani get along12Q. Brent Biggs?B2:68:9814A. Uh-huh. Yes, yes.14Q. And did you tell anyone at ECFMG that you and Brittani was growing up as well?B2:68:9215Q. You said Ms. Ellis and Jacquelyn got along15Ms. Ellis shared a daughter?B2:68:3816very well while Brittani was growing up as well?16A. No.B2:58:3817A. Not always, but we eventually got there.17Q. Did you tell Mr. Biggs that?B2:58:3718Q. Okay. Do you remember any18A. No.B2:58:4019specific anything specific that you're thinking of19Q. Do you ever remember telling any of yourB2:58:2821A. No. Just you know, we were young. We21A. No.B2:58:2822were all pretty young. So it was it wasn't perfect,22Q. Do you remember Brittani ever going to anyB2:58:3824It just wasn't perfect. It wasn't a perfect24at ECFMG?	D2:50:BB	10	before getting married?	10	A. After I got through that, I interviewed with
13 really well while growing up?  14 A. Uh-huh. Yes, yes.  15 Q. You said Ms. Ellis and Jacquelyn got along 15 Ms. Ellis shared a daughter?  16 very well while Brittani was growing up as well?  17 A. Not always, but we eventually got there.  18 Q. Okay. Do you remember any 18 A. No.  19:58:49 19 specific anything specific that you're thinking of 19 Q. Do you ever remember telling any of your 192:58:49 19 specific anything specific that you're thinking of 19 Q. Do you ever remember telling any of your 192:58:49 19 co-workers that Brittani was your daughter?  19:58:49 20 were all pretty young. So it was it wasn't perfect, 21 A. No.  22 were all pretty young. So it was it wasn't perfect, 23 Christmas parties during the time when you worked the 192:58:54 24 It just wasn't perfect. It wasn't a perfect 24 at ECFMG?	12:50:39	11	A. A year or two.	11	Artis and Brent.
12:58:98 14 A. Uh-huh. Yes, yes. 15 Q. You said Ms. Ellis and Jacquelyn got along 15 D2:58:34 16 very well while Brittani was growing up as well? 16 A. No. 12:58:38 17 A. Not always, but we eventually got there. 17 D2:58:37 18 Q. Okay. Do you remember any 18 A. No. 19 specific anything specific that you're thinking of 19 D2:58:49 19 specific anything specific that you're thinking of 19 D2:58:49 10 D2:58:40 20 when you say "we eventually got there"? 20 co-workers that Brittani was your daughter? 21 D2:58:25 22 were all pretty young. So it was it wasn't perfect, 23 Christmas parties during the time when you worked the 12:58:53 24 It just wasn't perfect. It wasn't a perfect 24 at ECFMG?	12:50:32	12	Q. And did Jacquelyn and Brittani get along	12	Q. Brent Biggs?
12:58:32 15 Q. You said Ms. Ellis and Jacquelyn got along 15 Ms. Ellis shared a daughter?  12:58:38 16 very well while Brittani was growing up as well?  13:58:38 17 A. Not always, but we eventually got there.  14 Q. Did you tell Mr. Biggs that?  15 A. No.  16 Very well while Brittani was growing up as well?  17 Q. Did you tell Mr. Biggs that?  18 Q. Okay. Do you remember any  18 A. No.  19 specific anything specific that you're thinking of  19 Q. Do you ever remember telling any of your  102:58:20 20 when you say "we eventually got there"?  102:58:22 21 A. No. Just you know, we were young. We  102:58:23 22 were all pretty young. So it was it wasn't perfect,  102:58:38 23 but nothing I don't remember any events or anything.  103:58:38 24 It just wasn't perfect. It wasn't a perfect  11 A. No.  12:58:58 24 It just wasn't perfect. It wasn't a perfect  24 at ECFMG?	112:58:03	13	really well while growing up?	13	A. Yes.
12:58:38 16 very well while Brittani was growing up as well? 17 A. Not always, but we eventually got there. 17 Q. Did you tell Mr. Biggs that? 18 Q. Okay. Do you remember any 18 A. No. 19 specific anything specific that you're thinking of 19 Q. Do you ever remember telling any of your 12:58:30 20 when you say "we eventually got there"? 20 co-workers that Brittani was your daughter? 21 A. No. Just you know, we were young. We 22 A. No. 12:58:38 23 but nothing I don't remember any events or anything. 24 It just wasn't perfect. It wasn't a perfect 24 at ECFMG?	12:58:28	14	A. Uh-huh. Yes, yes.	14	Q. And did you tell anyone at ECFMG that you an
12:58:38 17 A. Not always, but we eventually got there. 17 Q. Did you tell Mr. Biggs that? 18 Q. Okay. Do you remember any 18 A. No. 19:58:38 19 Specific anything specific that you're thinking of 19 Q. Do you ever remember telling any of your 12:58:38 20 when you say "we eventually got there"? 20 co-workers that Brittani was your daughter? 21 A. No. Just you know, we were young. We 21 A. No. 12:58:38 22 were all pretty young. So it was it wasn't perfect, 23 but nothing I don't remember any events or anything. 23 Christmas parties during the time when you worked the 12:58:38 24 It just wasn't perfect. It wasn't a perfect 24 at ECFMG?	112:58:82	15	Q. You said Ms. Ellis and Jacquelyn got along	15	Ms. Ellis shared a daughter?
12:58:37  18 Q. Okay. Do you remember any 19 specific anything specific that you're thinking of 19 Q. Do you ever remember telling any of your 12:58:38 20 when you say "we eventually got there"? 20 co-workers that Brittani was your daughter? 21 A. No. Just you know, we were young. We 22 12:58:38 23 but nothing I don't remember any events or anything. 24 It just wasn't perfect. It wasn't a perfect 24 at ECFMG?	12:58:34	16	very well while Brittani was growing up as well?	16	A. No.
19 specific anything specific that you're thinking of 19 Q. Do you ever remember telling any of your 12:56:22 20 when you say "we eventually got there"? 12:56:22 21 A. No. Just you know, we were young. We 12:56:25 22 were all pretty young. So it was it wasn't perfect, 12:56:38 23 but nothing I don't remember any events or anything. 12:56:38 24 It just wasn't perfect. It wasn't a perfect 24 at ECFMG?	12:00:18	17	A. Not always, but we eventually got there.	1.7	Q. Did you tell Mr. Biggs that?
12:56:2820when you say "we eventually got there"?20co-workers that Brittani was your daughter?12:56:2821A. No. Just you know, we were young. We21A. No.12:56:2522were all pretty young. So it was it wasn't perfect,22Q. Do you remember Brittani ever going to any12:56:3023but nothing I don't remember any events or anything.23Christmas parties during the time when you worked the12:56:3124It just wasn't perfect. It wasn't a perfect24at ECFMG?	12:08:37	1.8	Q. Okay. Do you remember any	18	A. No.
12:58:28 21 A. No. Just you know, we were young. We 21 A. No. 12:58:25 22 were all pretty young. So it was it wasn't perfect, 22 Q. Do you remember Brittani ever going to any 12:58:28 23 but nothing I don't remember any events or anything. 23 Christmas parties during the time when you worked the 12:58:58 24 It just wasn't perfect. It wasn't a perfect 24 at ECFMG?	12:58:49	19	specific anything specific that you're thinking of	19	Q. Do you ever remember telling any of your
12:58:38 22 were all pretty young. So it was it wasn't perfect, 22 Q. Do you remember Brittani ever going to any 12:58:38 but nothing I don't remember any events or anything. 23 Christmas parties during the time when you worked the 12:58:38 24 It just wasn't perfect. It wasn't a perfect 24 at ECFMG?	12:58:20	20	when you say "we eventually got there"?	20	co-workers that Brittani was your daughter?
12:58:38 23 but nothing I don't remember any events or anything. 23 Christmas parties during the time when you worked the 12:58:34 24 It just wasn't perfect. It wasn't a perfect 24 at ECFMG?	12:58:42	21	A. No. Just you know, we were young. We	21	A. No.
112:58:54 24 It just wasn't perfect. It wasn't a perfect 24 at ECFMG?	112:58:23	22	were all pretty young. So it was it wasn't perfect,	22	Q. Do you remember Brittani ever going to any
	112:58:39	23	but nothing I don't remember any events or anything	. 23	Christmas parties during the time when you worked the
12:58:52 25 circumstance, so 25 A. No.	12:50:54	24	It just wasn't perfect. It wasn't a perfect	24	at ECFMG?
	12:58:52	25	circumstance, so	25	A. No.

12 (Pages 42 to 45)

		46		48
122003:94	1	MS. HARROLD: Objection, asked and	1	long enough for a raise.
122003:99	2	answered.	2	I'm not even sure if I did the position
122003::55	3	A. No.	3	for a year or not. I just I don't remember an
122003::57	4	Q. (By Ms. O'Driscoll) Do you ever remember	4	evaluation.
122003::57	5	showing any pictures of Brittani to Kristy Edens?	5	Q. Okay. When you applied for the job at ECFMG,
122003:00	6	A. No, I don't remember doing that.	6	did you there is a question that asks, "Who do you
122003:08	7	Q. And you didn't you didn't tell anyone in	7	know that works at ECFMG?"
1220Q3::BF	8	management at ECFMG that you and Artis shared a	. 8	Did you list Ms. Ellis?
1220Q3;:B0	9	daughter?	9	A. I'm sure I did if they asked it, yeah.
1220013:148	10	A. No.	10	Q. When you started at ECFMG as an SP, do you
122003::58	11	Q. Did Artis tell you not to tell anybody that	11	remember seeing Ms. Ellis when you started?
122003:252	12	you and Brittani [sic] shared a daughter?	12	A. Yes.
122003:24	13	A. No.	13	Q. And was she surprised that you were there?
122004::27	14	Q. Did anyone at ECFMG know that Jackie was	14	Did she know that you were going to be there?
122004:302	15	Brittani's stepdaughter I'm sorry, stepmom. I	15	A. I remember yeah, she knew I was there.
122004:309	16	apologize.	16	She knew I was going to be there.
122004:30	17	A. I'm not sure if anybody there knew that	17	Q. How did she know that?
122004::39	18	Brittani was my daughter.	18	A. I remember seeing her when I interviewed with
12:04:14	19	Q. Okay.	19	John.
1220Q4::4D	20	A. I never discussed that wasn't workplace	20	Q. Okay. And did you talk with her then when
122004::49	2.1	discussion.	21	you interviewed with John?
122004::48	22	Q. You don't remember talking with any of the	22	A. I'm not sure. That's a busy place. I
122004::56	23	other SPs or trainers about Brittani being your	23	remember John wet and sweaty and moving fast, so it's
122004::54	24	daughter?	24	busy. I'm sure it was, "Oh, hey." I'm sure it was in
122004::54	25	A. It's possible; but no, I don't remember it.	25	passing.
	**************************************	47		49
12:01:50	1	Q. But it's possible?	1	Q. But Ms. Ellis wasn't she didn't act
12:04:56	2	A. I guess, yeah.	2	surprised when she saw you when you started working at
12:02:19	3	Q. When you applied for that promotion as	3	ECFMG?
12:02:26	4	trainer, you said you did, in fact, get it, correct?	4	A. No.
12:02:28	5	A. Uh-huh.	5	Q. Because she knew that you were going to be
12:02:20	6	Q. And was that a full-time position?	6	starting there?
12:02:20	7	A. Yes.	7	A. I assume so, yes.
12:02:27	8	Q. And you received benefits?	8	Q. And when you first start and you go through
12:02:28	9	A. Yes.	9	orientation, is there some sort of a presentation on
12:02:35	10	Q. And who did you report to at that time as	10	that first day?
12:02:35	11	full-time trainer?	11	A. I don't remember the orientation process.
12:09:37	12	A. Ms. Ellis and Brent.	12	Q. I will mark this as Exhibit 2.
12:02:40		Q. And do you recall Ms. Ellis doing any	13	Mr. Bryant, if you could take a look at
	13			
12:02:43	14	evaluations for you while you were trainer?	14	this, we will walk through the pages together.
12:08:48	14 15	evaluations for you while you were trainer?  A. I don't remember getting an evaluation. Like	14 15	this, we will walk through the pages together. (Marked was Bryant Exhibit No. 2.)
12:02:46 12:02:48	14 15 16	evaluations for you while you were trainer?  A. I don't remember getting an evaluation. Like I said, I don't even know how long I was there.	14 15 16	this, we will walk through the pages together. (Marked was Bryant Exhibit No. 2.)  A. Uh-huh.
12:02:48 12:02:48 12:02:59	14 15 16 17	evaluations for you while you were trainer?  A. I don't remember getting an evaluation. Like I said, I don't even know how long I was there.  Q. Okay.	14 15 16 17	this, we will walk through the pages together.  (Marked was Bryant Exhibit No. 2.)  A. Uh-huh.  Q. (By Ms. O'Driscoll) These are documents from
12:02:46 12:02:48 12:02:59 12:05:00	14 15 16 17 18	evaluations for you while you were trainer?  A. I don't remember getting an evaluation. Like I said, I don't even know how long I was there.  Q. Okay.  A. I don't remember an evaluation.	14 15 16 17 18	this, we will walk through the pages together.  (Marked was Bryant Exhibit No. 2.)  A. Uh-huh.  Q. (By Ms. O'Driscoll) These are documents from your personnel file at ECFMG.
12:02:48 12:03:48 12:03:59 12:03:50 12:03:53	14 15 16 17 18 19	evaluations for you while you were trainer?  A. I don't remember getting an evaluation. Like I said, I don't even know how long I was there.  Q. Okay.  A. I don't remember an evaluation.  Q. Do you remember getting raises while you were	14 15 16 17 18	this, we will walk through the pages together.  (Marked was Bryant Exhibit No. 2.)  A. Uh-huh.  Q. (By Ms. O'Driscoll) These are documents from your personnel file at ECFMG.  A. Uh-huh.
12:03:48 12:03:59 12:05:59 12:05:50 12:05:53 12:05:57	14 15 16 17 18 19 20	evaluations for you while you were trainer?  A. I don't remember getting an evaluation. Like I said, I don't even know how long I was there.  Q. Okay.  A. I don't remember an evaluation.  Q. Do you remember getting raises while you were working there?	14 15 16 17 18 19	this, we will walk through the pages together.  (Marked was Bryant Exhibit No. 2.)  A. Uh-huh.  Q. (By Ms. O'Driscoll) These are documents from your personnel file at ECFMG.  A. Uh-huh.  Q. And if you wouldn't mind going to Page 2, do
12:03:56 12:03:59 12:05:59 12:05:00 12:05:65 12:05:67 12:05:53	14 15 16 17 18 19 20 21	evaluations for you while you were trainer?  A. I don't remember getting an evaluation. Like I said, I don't even know how long I was there.  Q. Okay.  A. I don't remember an evaluation.  Q. Do you remember getting raises while you were working there?  A. I don't. I don't remember.	14 15 16 17 18 19 20 21	this, we will walk through the pages together.  (Marked was Bryant Exhibit No. 2.)  A. Uh-huh.  Q. (By Ms. O'Driscoll) These are documents from your personnel file at ECFMG.  A. Uh-huh.  Q. And if you wouldn't mind going to Page 2, do you recognize that letter dated November 3rd, 2008?
12:03:48 12:03:59 12:03:59 12:05:00 12:05:53 12:03:54 12:05:53 12:05:58	14 15 16 17 18 19 20 21 22	evaluations for you while you were trainer?  A. I don't remember getting an evaluation. Like I said, I don't even know how long I was there.  Q. Okay.  A. I don't remember an evaluation.  Q. Do you remember getting raises while you were working there?  A. I don't. I don't remember.  Q. You don't remember if your wage increased	14 15 16 17 18 19 20 21	this, we will walk through the pages together.  (Marked was Bryant Exhibit No. 2.)  A. Uh-huh.  Q. (By Ms. O'Driscoll) These are documents from your personnel file at ECFMG.  A. Uh-huh.  Q. And if you wouldn't mind going to Page 2, do you recognize that letter dated November 3rd, 2008?  A. Not particularly, but
12:03:48 12:03:59 12:03:59 12:03:03 12:03:03 12:03:03 12:03:33 12:03:33	14 15 16 17 18 19 20 21 22 23	evaluations for you while you were trainer?  A. I don't remember getting an evaluation. Like I said, I don't even know how long I was there.  Q. Okay.  A. I don't remember an evaluation.  Q. Do you remember getting raises while you were working there?  A. I don't. I don't remember.  Q. You don't remember if your wage increased during the time?	14 15 16 17 18 19 20 21 22	this, we will walk through the pages together.  (Marked was Bryant Exhibit No. 2.)  A. Uh-huh.  Q. (By Ms. O'Driscoll) These are documents from your personnel file at ECFMG.  A. Uh-huh.  Q. And if you wouldn't mind going to Page 2, do you recognize that letter dated November 3rd, 2008?  A. Not particularly, but  Q. Is that your address, 3318 La Mer Lane,
12:03:48 12:03:48 12:03:59 12:08:00 12:08:03 12:08:03 12:08:43 12:08:28 12:08:20 12:08:01	14 15 16 17 18 19 20 21 22 23 24	evaluations for you while you were trainer?  A. I don't remember getting an evaluation. Like I said, I don't even know how long I was there.  Q. Okay.  A. I don't remember an evaluation.  Q. Do you remember getting raises while you were working there?  A. I don't. I don't remember.  Q. You don't remember if your wage increased during the time?  A. When I went from SP to trainer, it certainly	14 15 16 17 18 19 20 21 22 23 24	this, we will walk through the pages together.  (Marked was Bryant Exhibit No. 2.)  A. Uh-huh.  Q. (By Ms. O'Driscoll) These are documents from your personnel file at ECFMG.  A. Uh-huh.  Q. And if you wouldn't mind going to Page 2, do you recognize that letter dated November 3rd, 2008?  A. Not particularly, but  Q. Is that your address, 3318 La Mer Lane, Spring, Texas 77388?
12:03:48 12:03:59 12:05:59 12:05:05 12:05:55 12:05:55 12:05:55 12:05:40 12:05:26	14 15 16 17 18 19 20 21 22 23	evaluations for you while you were trainer?  A. I don't remember getting an evaluation. Like I said, I don't even know how long I was there.  Q. Okay.  A. I don't remember an evaluation.  Q. Do you remember getting raises while you were working there?  A. I don't. I don't remember.  Q. You don't remember if your wage increased during the time?	14 15 16 17 18 19 20 21 22	this, we will walk through the pages together.  (Marked was Bryant Exhibit No. 2.)  A. Uh-huh.  Q. (By Ms. O'Driscoll) These are documents from your personnel file at ECFMG.  A. Uh-huh.  Q. And if you wouldn't mind going to Page 2, do you recognize that letter dated November 3rd, 2008?  A. Not particularly, but  Q. Is that your address, 3318 La Mer Lane,

		50		52
12:08:23	1	Q. And that was your address back then in 2008?	1	A. Okay.
12:08:23	2	A. Uh-huh.	2	Q that are going to happen through
12:08:20	3	Q. You just don't have a specific recollection	3	December 2008. Is that correct?
12:08:28	4	of receiving the offer letter?	4	
	ļ	-	5	A. Uh-huh, yes.
12:08:33	5	A. Right.	1	Q. And if you go to the next page after the offer letter, in the lower right-hand corner I may
12:08:35	6	Q. If you turn to the second page, that line	6	refer to Bates numbers. That's "ECFMG-ELLIS 7269."
12:08:38	7	towards the bottom where it says your name and date,		1
12:08:80	8	that your signature?	8	Do you see that in the
12:08:50	9	A. Uh-huh. Yes.	9	A. Okay.
12:08:55	10	Q. And the date on that is November 3rd?	10	Q. If you could turn one more page.
12:08:58	11	A. Right.	11	A. Oh, I'm sorry.
12:08:50	12	Q. And above that, after "Sincerely," do you	12	Q. That's okay. Those are Bates numbers; so if
12:08:00	13	recognize that to be Ms. Ellis' signature?	13	I refer to a number that's just in the bottom
12:08:62	14	A. I do.	14	right-hand corner, it kind of helps us
12:07:08	15	Q. If you go back to the first page of that	15	A. Okay.
12:08:58	16	offer letter, the first line, "It gives me great	16	Q guide through.
12:08:58	17	pleasure to confirm our offer of employment to you for		A. Okay.
12:08:59	18	the position of standardized patient. I've outlined	18	Q. That just means that I've provided it to
12:09:08	19	the specific details of our offer below."	19	Ms. Ellis' counsel, so I went ahead and numbered it.
12:09:03	20	First bullet, "You will report directly	20	A. Okay.
12:09:05	21	to Artis Ellis, Acting Center Manager."	21	Q. If you would, just take a minute to look at
12:09:08	22	A. Uh-huh.	22	this job description.
12:07:27	23	Q. Did I read that correctly?	23	A. Okay.
12:09:20	24	A. Uh-huh.	24	Q. You don't have to read through it in
12:09:30	25	Q. When you were hired at ECFMG, does that	25	substance necessarily, but I just wanted you to take a
		51		53
12:09:36	1	refresh your recollection that you were reporting to	1	minute to see if you recognize this job description.
12:09:38	2	Ms. Ellis?	2	A. (Reviewing) Okay.
12:09:52	3	A. No, because I remember reporting to John. I	3	Q. And on that first page of the job description
12:09:59	4	mean, that may be true; but I remember John being	4	where it says "Reports To: CSE Center Manager," that
12:09:57	5	there. I specifically I mean, I know what the guy	5	would be the center manager at Houston. Correct?
12:09:59	6	looks like, so	6	A. What section? Oh, yes, uh-huh.
12:00:00	7	Q. Do you remember him being there for very	7	Q. Where it says
12:00:08	8	long?	8	A. Yes, uh-huh.
12:00:08	9	A. No.	9	Q. And if you look on the last page of that job
12:00:08	10	Q. Or do you remember how long he was there?	10	description in the lower right-hand corner, it's
12:00:52	11	A. No idea. This was I don't remember what I		ECFMG-ELLIS 7272. Is that your signature towards the
12:00:59	12	did yesterday. You're asking I don't remember th	ì	bottom of the page dated 11-3-08?
12:00:35	13	letter, so	13	A. Yes.
12:00:29	14	Q. I understand. I understand. But this	14	Q. And a couple of lines above that you see
12:00:23	15	letter this offer letter is from Artis Ellis to you.	15	Artis Ellis' signature?
12:00:28	16	A. Okay.	16	A. Uh-huh.
12:00:00	17	Q. Correct?	17	Q. And do you remember when you signed your
12:00:00	1	A. Sure.	18	paperwork, job description, and other paperwork?
	18		ł	A. Uh-huh.
12:09:08	19	Q. And that's your signature on the second page?	19	
12:00:09	20	A. Yes.	20	Q. Do you remember do you have a specific
12:09:06	21	Q. And on that first page of the offer letter it	21	recollection of how you received that paperwork when
			, ,,	
12:00:13	22	walks through a number of dates related to orientation	ļ	you started working at ECFMG?
12:00:48	23	on November 3rd. Is that correct?	23	A. No, I can't say that I do.
	1		ļ	

14 (Pages 50 to 53)

			,	
		54		56
12:10:98	1	out?	1	Did I read that correctly?
12:10:96	2	A. No. It sounds like an orientation process	2	A. Yes.
12:13:08	3	Q. But you don't recall?	3	Q. If you go two boxes down, "How did you learn
12:13:05	4	A. No.	4	about Step 2 CS?"
12:13:03	5	Q. Okay. If you turn after that last page go	5	Do you know what "CS" stands for?
12:18:50	6	to the next page. It's hard to read the letter the	6	A. No, I don't.
12:18:55	7	number on the bottom. They kind of overlapped.	7	Q. So it says, "How did you learn about Step 2
12:13:58	8	A. Yes, ma'am.	8	CS?"
12:18:59	9	Q. But the title of the document at the top	9	And you put "Relative."
12:11:20	10	left-hand corner says "Troi Bryant."	10	"Who? Jackie Bryant."
12:14:02	11	A. Yes.	11	Did I read that correctly?
112:11:03	1.2	Q. And the title is "Application for	12	A. Yes.
12:14:03	1.3	Employment".	13	Q. Then on the next line it says, "Do you know
112:11:08	14	A. Yes.	1.4	anyone who works at ECFMG?"
12:14:08	15	Q. If you would just take a minute to look at	15	A. Uh-huh.
112:14:08	16	this, it's a few pages long. Is this the application	16	Q. And you answered "Yes." Is that correct?
12:11:02	17	that you filled out for ECFMG?	17	A. Uh-huh.
12:12:10	18	A. (Reviewing).	18	Q. And then below that it says, "If yes, state
12:13:13	19	Q. Was this an on-line application?	19	the names of your relationship to that person."
12:12:15	20	A. I think so. I don't remember now.	20	A. Uh-huh.
12:12:15	21	Q. If you go to in the upper right-hand	21	Q. "Jackie Bryant/relative."
12:12:18	22	corner it says "Page 1 of 9"; and if you flip over to	22	A. Uh-huh.
12:13:28	23	Page 7 of 9, it's something that appears to be an	23	O. Do you know why you didn't put "Artis Ellis"
12:13:25	24	electronic signature. I don't know if this is	24	there on that job application?
12:13:28	25	will is that your electronic signature?	25	A. No, I have no idea why I didn't. To me, that
12.12.04	20	will 15 that your electronic signature:	20	A. 170, 1 have no mea my toma to a my ma
•		55		57
112:14:25	1	A. Yes.	1	was it made sense. I wanted them to know that
12:14:23	2	Q. Do you remember if you did this at a computer	2	knew my wife worked there, so
112:14:36	3	or how you filled this out?	3	It just made sense.
112:14:38	4	A. I'm sure I did it at a computer. That's the	4	Q. But when the question asks, "Do you know
12:14:30	5	only way you could do that, yeah. I don't remember	5	anyone who works at ECFMG?" at that time you knew
12:14:38	6	where I was, but	6	multiple people that worked at ECFMG. Correct?
12:14:48	7	Q. If you look back at that first page of the	7	A. Yes.
112:112:49	8	application, right below Application for Employment, d	o 8	Q. And one of those people included Artis Ellis?
112:14:56	9	you see that date that's to the right of your name?	9	A. Right.
12:12:56	10	A. Okay.	10	Q. Okay. And did you attend business school at
12:19:58	11	Q. And what is that date?	11	Kaplan Houston?
112:12:58	12	A. 11-4 of '08.	12	A. Some training, yes.
12:13:02	13	Q. Do you know why this application is dated the	13	Q. I'm sorry?
12:13:06	14	day after your offer letter?	14	A. Some training through Kaplan, yes.
12:15:07	15	A. I have no idea.	15	Q. Training? Okay. Was there and what kind
12::13:10	16	Q. Do you remember filling out the application	16	of training was that?
12:15:11	17	paperwork prior to receiving an offer?	17	A. It was financial service-type training,
12::15:19	18	A. No, huh-uh. It doesn't make sense to me, no.	18	preparing for Blue Sky Law test, things like that,
12:13:29	19	Q. So you don't know why that's the day after	19	mutual funds test.
12:13:28	20	your offer letter?	20	Q. Okay. Did you stay working as a Met Life
12:15:46	21	A. No.	21	financial services advisor throughout the time that you
12:15:30	22	Q. If you go a little bit further down, it says,	22	were also promoted as a trainer?
12:15:59	23	"Position Applying For: Standardized Patient," on the	23	A. No.
	23	first page of the Application for Employment.	24	Q. So when you were promoted from a part-time
12:15:59	4	HEST DAVE OF THE ADDITIONATION FOR PURDIOVINGUE.	4.4	C SO when you were bromoled from a part-timel
12:13:97	25	"Starting Salary, \$16 an hour."	25	position as SP up to trainer, you no longer worked at

1		. 58		60
12:18:00	1	Met Life?	1.	A. No, I don't.
02:18:06	2	A. I resigned.	2	Q. If you turn to the second page at 7279, is
02:18:49	3	Q. Do you remember what your salary was when ye	ъп 3	that your signature under "In witness whereof"?
12:18:18	4	were promoted to trainer?	4	A. Yes.
12:16:28	5	A. No, I don't.	5	Q. A then a few lines and that's dated
12:19:02	6	<ul> <li>Q. Was it a salary position or an hourly</li> </ul>	6	11-3-08?
12:15:25	7	position?	7	A. Uh-huh. Yes.
02:15:26	8	A. I'm not sure. I think it was salary. I'm	8	Q. So were you it appears you were filling
12:15:32	9	not sure. Whatever	9	all of these documents out on the same date. Is that
12:15:88	10	Q. But you got a raise?	10	correct?
112:15:Bb	11	A. Right. I did. It was	11	A. Looks like it, uh-huh.
12:15:43	12	Q. And if you could turn to the page that's	12	Q. And then that's do you recognize that as
12:16:43	13	after the on-line application, so in the bottom lower	13	Artis Ellis' signature as your supervisor or manager
02:15:22	14	corner it's ECFMG-ELLIS 6997.	14	right below that?
12:19:22	15	At the top of this page it says "ECFMG	15	A. It looks like the previous ones, yes.
12:19:26	16	New PTAN Employee Form."	16	<ul> <li>Q. And you understood as a standardized patient</li> </ul>
12:19:29	17	Do you remember filling this form out?	17	through this agreement, through the Clinical Skills
02:19:39	18	A. No, but clearly I did.	18	Evaluation, that you were going to be handling
12:19:34	19	Q. I'm sorry?	19	confidential information?
12:19:39	20	A. I said: No, but clearly I did.	20	A. Yes.
02:19:33	21	Q. That's your handwriting?	21	Q. And as a standardized patient, do you ever
12:19:43	22	A. It looks like it, yes.	22	remember were you ever sent home during an exam?
12:19:48	23	MS. HARROLD: What's the page number?	23	A. Sent home?
12:19:39	24	MS. O'DRISCOLL: In the lower corner	24	Q. Yes, involuntarily. Like, for example, if
02:19:54	25	it's 6997.	25	you showed up and had a sore throat or had a bruise or
		59		61
12:117:33	1	MS. HARROLD: Okay.	1	anything of that nature? Do you ever remember being
22:120::97	2	Q. (By Ms. O'Driscoll) Is that your handwritin	0 2	sent home as a standardized patient?
22:120::92	3	on 6997?	3	A. No.
22:120:34	4	A. It looks like it.	4	Q. And I know you said that you and Ms. Ellis
22:120::50	5	Q. It looks like there's a couple of different	5	talk or text regularly on holidays. Do you remember
P2:120:59	6	types of handwriting.	6	the last time that you spoke with her prior to today?
12:120:50	7	A. That's not my handwriting (indicating).	7	A. No.
22:128:00	8	Q. Where it says "standardized patient"?	8	Q. Or texted with her?
123 128 : 04	9	A. Right.	9	A. I can't remember.
22:128:04	10	Q. But before that that is your handwriting?	1.0	Q. Would it be within the last month?
123 128 : 08	11	A. Looks like it, yeah.	11	A. Maybe two or three months ago. I'm not sure.
22:128:18	12	Q. And your hire date is 11-3-08?	12	O. And do you remember what you-all talked
22:128:20	13	A. Uh-huh.	13	about?
P2 128 : P0	14	Q. Is that correct?	14	A. No, huh-uh.
22 128 : 27	15	A. Uh-huh.	15	Q. Do you remember when you first heard that
22:128:22	16	Q. Where it says "Supervisor Name," it lists	16	Ms. Ellis had filed a lawsuit against her former
P2:128:24	17	"Artis Ellis." Correct?	17	employer?
22 128 : 28	18	A. Uh-huh.	18	A. Years ago.
22:128::29	19	Q. Do you also if you could skip a couple of	1	Q. And how did you hear about it?
22:128::31	20	pages forward at 7277	20	A. I don't know. Scuttlebutt. I'm not sure how
12:1281:37	21	A. Uh-huh. Okay.	21	I found out.
22:1281:38	22	Q to the Clinical Skills Evaluation	22	Q. Did you hear it from Ms. Ellis?
12:1281::40	23	Collaboration.	2.3	A. No.
P2 1281: 49	24	A. Okay.	24	Q. When you say "years ago," what does that
P2:1281:42	25	Q. Do you remember filling out this document	1	mean? Few years? A couple of years? Do you remember?
. A 12 "F A	1 2.5	C. Do you remember minig our mis document	1	

16 (Pages 58 to 61)

		62		64
112:24:23	1	A. I've been separated from this company for	1	Q. If you look where it says "Old Information"
12:24:25	2	five years. It was years ago. At least five years	2	on the left side, it says "\$16.00" and "New
112:24:49	3	ago.	3	Information," it says "\$18.50."
12:24:30	4	Q. You think you heard that Ms. Ellis filed a	4	A. Uh-huh.
112:24:35	5	lawsuit at least five years ago?	5	Q. And then the date, "Effective Date:
12:24:98	6	A. I knew that she separated from the company	t 6	February 20, 2009."
112:24:05	7	least five years ago.	7	A. Okay.
12:24:85	8	Q. And how did find out that she separated?	8	Q. Does that refresh your recollection that you
112:24:09	9	A. Scuttlebutt. I don't know.	9	were given a raise during that time period?
12:24:40	10	Q. What does that mean to you, scuttlebutt?	10	A. No, it doesn't; but clearly I was.
12:24:42	11	A. Rumors, somebody told me. I'm not sure if it	11	Q. Okay. Do you remember Ms. Ellis telling you
112:24:45	12	was in passing or what the conversation was or who.	12	that you were getting a raise?
112:24:49	13	Q. Do you remember if Brittani told you?	13	A. No, I don't remember her telling me that.
12:24:35	14	A. No, I don't remember Brittani telling me.	14	Q. If you go to the next page, Clinical Skills
12:22:03	15	No.	15	Evaluation Collaboration, dated January 12, 2010
12:22:03	16	Q. Okay. Do you remember Ms. Ellis telling you?	16	A. Uh-huh.
12:22:08	17	A. No, I don't remember her telling me, no.	17	Q to Mr. Bryant. If you could, just take a
12:22:21	18	Q. Did you hear why she separated?	18	minute to look at this.
12:22:29	19	A. No.	19	Do you remember receiving this?
12:22:21	20	Q. As you sit here today, have you ever heard	20	A. (Reviewing) No, I don't remember receiving
12:22:29	21	why she separated from the company?	21	this.
12:22:30	22	A. No. Not that I can no.	22	Q. In the "To" line it says it's addressed to
12:29:39	23	Q. Did you hear something?	23	you, correct?
12:22:30	24	A. No.	24	A. In the yes, it does.
12:22:36	25	Q. Do you and Ms. Artis Ellis have any mutual	25	Q. And then in "From" it says, "Artis Ellis,
		63		65
12:28:90	1	friends?	1	Center Manager. Angelo Williams, Standardized Patie
12:28:50	2	A. Uh-huh, yes.	2	Trainer."
12:22:52	3	O. And who are those friends?	3	Did I read that correctly?
12:28:52	4	A. I know her brother.	4	A. Yes, you did.
12:22:53	5	Q. Anybody else?	5	Q. And then in the "RE:" line, in bold, "Annual
12:28:58	6	A. I'm not sure. I'm sure I do, but I don't	6	Standardized Patient Evaluation"?
12:23:60	7	know I don't know their names right now.	7	A. Okay.
12:23:00	8	Q. Okay. Did you know her brother from high	8	Q. For 2009?
12:23:50	9	school?	9	A. Okay. Yes.
12:23:50	10	A. No.	10	Q. And did that refresh your recollection that
12:23:59	11	Q. How did you know her brother?	11	you did receive evaluations during that time period?
	12	A. I've known him in the last three years.	12	A. Sure. I don't remember any of this, but
12:29-59	l .	in the matter man in the mot times years.	1	in butter I don't remember any or mis, but
12:28:59 12:28:05	1.2	O I will mark this as Exhibit 3	113	clearly I did.
12:28:05	13	Q. I will mark this as Exhibit 3. (Marked was Bryant Exhibit No. 3.)	13	clearly I did.  O Okay, If you go to the next page, is that
12:28:05 12:28:08	14	(Marked was Bryant Exhibit No. 3.)	14	Q. Okay. If you go to the next page, is that
12:28:05 12:28:08 12:28:09	14 15	(Marked was Bryant Exhibit No. 3.) Q. (By Ms. O'Driscoll) The first page is	14 15	Q. Okay. If you go to the next page, is that your signature there where it says "Troi" I'm sorry,
12:28:05 12:28:08 12:28:09 12:28:52	14 15 16	(Marked was Bryant Exhibit No. 3.) Q. (By Ms. O'Driscoll) The first page is ECFMG-ELLIS 0235. If you could take a minute to loo	14 15 ok 16	Q. Okay. If you go to the next page, is that your signature there where it says "Troi" I'm sorry, above the line, "Standardized Patient"?
12:28:05 12:28:08 12:28:09 12:28:52 12:28:54	14 15 16 17	(Marked was Bryant Exhibit No. 3.) Q. (By Ms. O'Driscoll) The first page is ECFMG-ELLIS 0235. If you could take a minute to loat that document, sir.	14 15 ok 16 17	Q. Okay. If you go to the next page, is that your signature there where it says "Troi" I'm sorry, above the line, "Standardized Patient"?  A. Yes.
12:28:05 12:26:08 12:26:09 12:26:52 12:26:54 12:26:58	14 15 16 17 18	(Marked was Bryant Exhibit No. 3.) Q. (By Ms. O'Driscoll) The first page is ECFMG-ELLIS 0235. If you could take a minute to locat that document, sir. A. (Reviewing).	14 15 ok 16 17 18	Q. Okay. If you go to the next page, is that your signature there where it says "Troi" I'm sorry, above the line, "Standardized Patient"?  A. Yes.  Q. And that's dated January I'm not sure if
12:28:05 12:26:08 12:26:09 12:26:52 12:26:54 12:26:58 12:26:04	14 15 16 17 18 19	(Marked was Bryant Exhibit No. 3.) Q. (By Ms. O'Driscoll) The first page is ECFMG-ELLIS 0235. If you could take a minute to locat that document, sir. A. (Reviewing). Q. At the top of this document, 7235, it's	14 15 ok 16 17 18 19	Q. Okay. If you go to the next page, is that your signature there where it says "Troi" I'm sorry, above the line, "Standardized Patient"?  A. Yes.  Q. And that's dated January I'm not sure if that's "11" or "13," 2010.
12:28:05 12:28:09 12:28:52 12:28:54 12:28:58 12:26:07 12:26:00	14 15 16 17 18 19 20	(Marked was Bryant Exhibit No. 3.) Q. (By Ms. O'Driscoll) The first page is ECFMG-ELLIS 0235. If you could take a minute to loat that document, sir. A. (Reviewing). Q. At the top of this document, 7235, it's called "ECFMG Personnel Information Change Form."	14 15 ok 16 17 18 19 20	Q. Okay. If you go to the next page, is that your signature there where it says "Troi" I'm sorry, above the line, "Standardized Patient"?  A. Yes. Q. And that's dated January I'm not sure if that's "11" or "13," 2010.  A. Yes.
12:28:05 12:28:09 12:28:52 12:28:54 12:28:58 12:26:07 12:26:06 12:26:20	14 15 16 17 18 19 20 21	(Marked was Bryant Exhibit No. 3.) Q. (By Ms. O'Driscoll) The first page is ECFMG-ELLIS 0235. If you could take a minute to loat that document, sir. A. (Reviewing). Q. At the top of this document, 7235, it's called "ECFMG Personnel Information Change Form." A. Okay.	14 15 0k 16 17 18 19 20 21	Q. Okay. If you go to the next page, is that your signature there where it says "Troi" I'm sorry, above the line, "Standardized Patient"?  A. Yes. Q. And that's dated January I'm not sure if that's "11" or "13," 2010.  A. Yes. Q. And then a couple of lines below that the
12:28:05 12:28:09 12:28:52 12:28:54 12:28:58 12:26:04 12:26:00 12:26:20	14 15 16 17 18 19 20 21 22	(Marked was Bryant Exhibit No. 3.) Q. (By Ms. O'Driscoll) The first page is ECFMG-ELLIS 0235. If you could take a minute to locat that document, sir. A. (Reviewing). Q. At the top of this document, 7235, it's called "ECFMG Personnel Information Change Form." A. Okay. Q. Have you ever seen a document like this?	14 15 ok 16 17 18 19 20 21 22	Q. Okay. If you go to the next page, is that your signature there where it says "Troi" I'm sorry, above the line, "Standardized Patient"?  A. Yes. Q. And that's dated January I'm not sure if that's "11" or "13," 2010.  A. Yes. Q. And then a couple of lines below that the center manager also signed off on that, correct?
12:28:08 12:28:09 12:28:52 12:28:54 12:28:58 12:26:04 12:26:20 12:26:20 12:26:20	14 15 16 17 18 19 20 21 22 23	(Marked was Bryant Exhibit No. 3.) Q. (By Ms. O'Driscoll) The first page is ECFMG-ELLIS 0235. If you could take a minute to locat that document, sir. A. (Reviewing). Q. At the top of this document, 7235, it's called "ECFMG Personnel Information Change Form." A. Okay. Q. Have you ever seen a document like this? A. I don't remember it.	14 15 ok 16 17 18 19 20 21 22 23	Q. Okay. If you go to the next page, is that your signature there where it says "Troi" I'm sorry, above the line, "Standardized Patient"?  A. Yes. Q. And that's dated January I'm not sure if that's "11" or "13," 2010.  A. Yes. Q. And then a couple of lines below that the center manager also signed off on that, correct?  A. Yes.
12:28:08 12:28:09 12:28:52 12:28:54 12:28:58 12:26:04 12:26:00 12:26:20	14 15 16 17 18 19 20 21 22	(Marked was Bryant Exhibit No. 3.) Q. (By Ms. O'Driscoll) The first page is ECFMG-ELLIS 0235. If you could take a minute to locat that document, sir. A. (Reviewing). Q. At the top of this document, 7235, it's called "ECFMG Personnel Information Change Form." A. Okay. Q. Have you ever seen a document like this?	14 15 ok 16 17 18 19 20 21 22	Q. Okay. If you go to the next page, is that your signature there where it says "Troi" I'm sorry, above the line, "Standardized Patient"?  A. Yes. Q. And that's dated January I'm not sure if that's "11" or "13," 2010.  A. Yes. Q. And then a couple of lines below that the center manager also signed off on that, correct?

		66		68
12::28:32	1	during that time period that Ms. Ellis signed off on?	1	Yeah, we did.
12:28:36	2	A. I mean, clearly I did; but no, I don't	2	Q. So you would have meetings with Ms. Ellis
12:28:38	3	remember it.	3	A. Right.
12:28:39	4	Q. Okay.	4	Q as part of your job duties?
12:28:48	5	A. It might be important for you to know this	5	A. Right, right. As a trainer, yes.
112::28:40	6	was insignificant to me, so I don't remember all of	6	Q. As a trainer?
12::26:59	7	these details.	7	A. Yes.
12::28:50	8	Q. Okay. But you remember working at ECFMG?		Q. And that was pretty regular?
112::28:55	9	A. Right, right.	9	A. I imagine it was, yeah.
12:26:56	10	Q. During this time period you were working at	10	(Marked was Bryant Exhibit No. 4.)
12::26:58	11	least 20 hours a week?	11	Q. (By Ms. O'Driscoll) We're going to mark as
12::28:59	12	A. I'm not even sure if that was accurate, but	12	Exhibit 4 (tendering). This is ECFMG-ELLIS 7227 on t
112::27:03	13	that was something like that.	13	first page.
12:27:09	14	Q. But it was a part-time job that you were	14	This is another copy of the Clinical
12:27:05	15	going to	15	Skills Evaluation Collaboration, the Confidentiality
	1		16	and Non-Disclosure Agreement?
112::27:06	16	A. Yeah, right. O each week?	17	_
12:27:08	17			A. Uh-huh.  O. Does that look familiar?
12::27:08	18	A. Right.	18	
112::27:08	19	Q. Where Ms. Ellis was center manager?	19	A. Vaguely, yeah.
112::27:20	20	A. Right.	20	Q. If you turn to the last page, is that your
112::27:2B	21	Q. And how often would you see Ms. Ellis when	21	signature?
112::27:23	22	you were at work?	22	A. Yes.
112::27:23	23	THE STREET THE STREET STREET	t 23	Q. And that's dated January 10, 2011?
112::27:28	24	depends. We're in an exam. We're isolated.	24	A. Uh-huh.
12:29:29	25	Q. Okay.	25	Q. And below "Supervisor," next to the line
		67		69
.22229::20	1	A. I probably wouldn't see her if I was there.	1	"Supervisor or Manager," that's Artis Ellis' signature,
.22229::23	2	Twice I probably wouldn't see her.	2	correct?
.22229::25	3	Q. I'm sorry. Twice you wouldn't see her?	3	A. Yes.
.22229:28	4	A. Twice in one week.	4	Q. And during this time in 2011 had you already
.22229::29	5	Q. Okay. Did you-all have meetings in the	5	been promoted to the trainer position?
.23229:30	6	mornings before the exam?	6	A. I don't know. You tell me. I'm not sure. I
22229:32	7	A. With the trainers, uh-huh.	7	don't know what my promotion date was. I thought I s
22230:39	8	Q. Would Ms. Ellis ever go to those meetings?	8	it on one of these documents, but
22 23/0::3073	9	A. Occasionally.	9	Q. Well, if we look back on
22230:404	10	Q. If you I'm going to mark this as	10	A. No, it wasn't 2010. I'm not sure when I was
22 230::57	11	Exhibit 4.	11	promoted. I was still part-time in 2010, so
.22230::09	12	During those morning meetings didn't	12	This is 2011. I'm not sure if I was or
.22230:23	13	Ms. Ellis conduct them?	13	not.
22230:23	14	A. No, no, huh-uh.	14	Q. I think I have another document that can help
.22230::25	15	Q. Did she conduct some of them?	15	us on that, actually.
.22230:2B	16	A. No, I remember them being led by the	16	We will mark this as Exhibit 5.
.22230:24	17		17	(Marked was Bryant Exhibit No. 5.)
.22 230::24	į.	trainers.	18	Q. (By Ms. O'Driscoll) Could you take a look at
	18	Q. Okay.	19	Exhibit 5 on that first page?
.22 230::24	19	A. Because I did it as a trainer, but the	1	
.22 230::26	20	morning meetings.	20	A. Uh-huh.
.22230::28	21	Q. Did you as a trainer ever have to have	21	Q. This letter is dated April 27, 2010. It's
.22230::30	22	meetings with the assistant manager and the center	22	addressed to Troi Bryant, again at 3318 La Mer Lane.
.22231::03	23	manager to kind of coordinate and get a game plan		That was still your address?
.22231::DB	24	exams?	24	A. Yes.
. 22 231::38	25	A. Not for exams. We had I guess, yes.	25	Q. "Dear Troi, this letter is to confirm your

18 (Pages 66 to 69)

		70		72
122313.09	1	acceptance of the promotion of the full time position	1	do.
122313:122	2	of Standardized Patient Trainer in the Houston Center		Q. Did you say 18 weeks or 18 months?
122313:123	3	Did I read that correctly?	. 3	A. 18 months.
122313:123	4	A. Yes.	4	Q. And that was during the time when you were
122313:123	5	Q. "I've outlined the specifics details of your	5	working part-time as SP and you were doing the
122313.130	6	offer below."	6	financial planning on the side?
122313:136	7	First bullet, "You will report directly	7	A. (Moving head up and down.)
12231320	8	to Artis Ellis, Center Manager, Houston Center."	8	Q. So were you relieved when you got that
12:33:33	9	A. Uh-huh.	9	promotion to trainer?
122313235	10	O. Is that correct?	10	A. Sure.
122313242	11	A. Yes.	11	Q. Do you remember talking to Ms. Ellis, letting
12231320	12	Q. "Your start date for this position will be	12	her know that you were going to be applying for the
12231324	13	May 10, 2010."	13	promotion?
122313248	14	Did I read that correctly?	14	A. I did not.
122313.249	15	A. Yes.	15	Q. You didn't mention it to her?
12231320	16	Q. And does that refresh your recollection that	16	A. Huh-uh.
122313:30	17	you were promoted in May of or you received the	17	Q. Do you remember talking to anyone about
122333332	18	letter in late April but it was effective in May 2010?	18	applying for the promotion?
122333355	19	A. Uh-huh.	19	A. Uh-huh. I was encouraged to.
122313:30	20	Q. Okay. And that third bullet, "Your starting	20	Q. And who encouraged you?
122313:39	21	salary" from this non-exempt position "for this	21	A. Some of the other trainers.
122314:42	22	non-exempt position will be \$46,000 per year or	22	Q. And do you remember who that was?
122314:498	23	25,000 I'm sorry, \$25.27 per hour?	23	A. I'm sure Kristy and Angelo. I didn't even
122334506	24	A. Okay.	24	remember Angelo was my trainer. But Kristy and Angelo
122314510	25	Q. Did I read that correctly?	25	those guys. I mean, just the group.
		71		73
112::34:52	1	71 A. Uh-huh.	1	<ul><li>73</li><li>Q. Do you ever remember Ms. Ellis encouragin</li></ul>
112::34 : 52 112::34 : 53	1 2		1 2	
		A. Uh-huh.		Q. Do you ever remember Ms. Ellis encouragin
1122::34:53	2	A. Uh-huh.  Q. So you got a significant increase from being	2	Q. Do you ever remember Ms. Ellis encouraging you to apply for the promotion?
112::34:54 112::34:56	2 3	A. Uh-huh.  Q. So you got a significant increase from being part-time SP up to a full-time trainer?	2 3	<ul><li>Q. Do you ever remember Ms. Ellis encouraging you to apply for the promotion?</li><li>A. Not really. No.</li></ul>
112::34 : 54 112::34 : 56 112::34 : 20	2 3 4	A. Uh-huh.  Q. So you got a significant increase from being part-time SP up to a full-time trainer?  A. Yes.	2 3 4	<ul> <li>Q. Do you ever remember Ms. Ellis encouraging you to apply for the promotion?</li> <li>A. Not really. No.</li> <li>Q. If you go to the next page, it's "Vanguard"</li> </ul>
112::34 : 54 112::34 : 56 112::34 : 20 112::34 : 26	2 3 4 5	A. Uh-huh.  Q. So you got a significant increase from being part-time SP up to a full-time trainer?  A. Yes.  Q. In that next paragraph it describes your	2 3 4 5	<ul> <li>Q. Do you ever remember Ms. Ellis encouraging you to apply for the promotion?</li> <li>A. Not really. No.</li> <li>Q. If you go to the next page, it's "Vanguard 403(b)(7) New Account Form."</li> <li>A. Okay.</li> <li>Q. Do you remember filling out this Vanguard</li> </ul>
112::34:58 112::34:56 112::34:20 112::34:28	2 3 4 5 6	<ul> <li>A. Uh-huh.</li> <li>Q. So you got a significant increase from being part-time SP up to a full-time trainer?</li> <li>A. Yes.</li> <li>Q. In that next paragraph it describes your benefits, benefit programs. Do you recall that,</li> </ul>	2 3 4 5 6	<ul> <li>Q. Do you ever remember Ms. Ellis encouraging you to apply for the promotion?</li> <li>A. Not really. No.</li> <li>Q. If you go to the next page, it's "Vanguard 403(b)(7) New Account Form."</li> <li>A. Okay.</li> </ul>
112::34:54 112::34:56 112::34:20 112::34:20 112::34:30	2 3 4 5 6 7	<ul> <li>A. Uh-huh.</li> <li>Q. So you got a significant increase from being part-time SP up to a full-time trainer?</li> <li>A. Yes.</li> <li>Q. In that next paragraph it describes your benefits, benefit programs. Do you recall that, receiving benefits as a trainer?</li> <li>A. Yes.</li> <li>Q. And in that lower right-hand corner, is that</li> </ul>	2 3 4 5 6 7	Q. Do you ever remember Ms. Ellis encouraging you to apply for the promotion?  A. Not really. No. Q. If you go to the next page, it's "Vanguard 403(b)(7) New Account Form."  A. Okay. Q. Do you remember filling out this Vanguard paperwork while you worked for ECFMG?  A. Okay.
112::34:54 112::34:56 112::34:20 112::34:30 112::34:30 112::34:34	2 3 4 5 6 7 8	<ul> <li>A. Uh-huh.</li> <li>Q. So you got a significant increase from being part-time SP up to a full-time trainer?</li> <li>A. Yes.</li> <li>Q. In that next paragraph it describes your benefits, benefit programs. Do you recall that, receiving benefits as a trainer?</li> <li>A. Yes.</li> </ul>	2 3 4 5 6 7 8	Q. Do you ever remember Ms. Ellis encouraging you to apply for the promotion?  A. Not really. No. Q. If you go to the next page, it's "Vanguard 403(b)(7) New Account Form."  A. Okay. Q. Do you remember filling out this Vanguard paperwork while you worked for ECFMG?  A. Okay. Q. Do you recall that?
112::34:54 112::34:56 112::34:20 112::34:30 112::34:30 112::34:34 112::34:34	2 3 4 5 6 7 8	<ul> <li>A. Uh-huh.</li> <li>Q. So you got a significant increase from being part-time SP up to a full-time trainer?</li> <li>A. Yes.</li> <li>Q. In that next paragraph it describes your benefits, benefit programs. Do you recall that, receiving benefits as a trainer?</li> <li>A. Yes.</li> <li>Q. And in that lower right-hand corner, is that your signature dated May 4, 2010?</li> <li>A. Yes.</li> </ul>	2 3 4 5 6 7 8	Q. Do you ever remember Ms. Ellis encouraging you to apply for the promotion?  A. Not really. No. Q. If you go to the next page, it's "Vanguard 403(b)(7) New Account Form."  A. Okay. Q. Do you remember filling out this Vanguard paperwork while you worked for ECFMG?  A. Okay. Q. Do you recall that? A. Vaguely, yeah.
112::34:54 112::34:56 112::34:20 112::34:20 112::34:30 112::34:34 112::34:34 112::34:39 112::34:39	2 3 4 5 6 7 8 9 10 11	<ul> <li>A. Uh-huh.</li> <li>Q. So you got a significant increase from being part-time SP up to a full-time trainer?</li> <li>A. Yes.</li> <li>Q. In that next paragraph it describes your benefits, benefit programs. Do you recall that, receiving benefits as a trainer?</li> <li>A. Yes.</li> <li>Q. And in that lower right-hand corner, is that your signature dated May 4, 2010?</li> <li>A. Yes.</li> <li>Q. If you go to the next page, did you make more</li> </ul>	2 3 4 5 6 7 8 9 10 11	Q. Do you ever remember Ms. Ellis encouraging you to apply for the promotion?  A. Not really. No. Q. If you go to the next page, it's "Vanguard 403(b)(7) New Account Form."  A. Okay. Q. Do you remember filling out this Vanguard paperwork while you worked for ECFMG?  A. Okay. Q. Do you recall that? A. Vaguely, yeah. Q. Is that your handwriting?
112::34:54 112::34:56 112::34:20 112::34:20 112::34:30 112::34:30 112::34:34 112::34:34 112::34:38	2 3 4 5 6 7 8 9 10	<ul> <li>A. Uh-huh.</li> <li>Q. So you got a significant increase from being part-time SP up to a full-time trainer?</li> <li>A. Yes.</li> <li>Q. In that next paragraph it describes your benefits, benefit programs. Do you recall that, receiving benefits as a trainer?</li> <li>A. Yes.</li> <li>Q. And in that lower right-hand corner, is that your signature dated May 4, 2010?</li> <li>A. Yes.</li> </ul>	2 3 4 5 6 7 8 9 10 11 12	Q. Do you ever remember Ms. Ellis encouraging you to apply for the promotion?  A. Not really. No. Q. If you go to the next page, it's "Vanguard 403(b)(7) New Account Form."  A. Okay. Q. Do you remember filling out this Vanguard paperwork while you worked for ECFMG?  A. Okay. Q. Do you recall that? A. Vaguely, yeah. Q. Is that your handwriting? A. Yes.
112::34:54 112::34:56 112::34:20 112::34:20 112::34:30 112::34:34 112::34:34 112::34:39 112::34:39	2 3 4 5 6 7 8 9 10 11	A. Uh-huh. Q. So you got a significant increase from being part-time SP up to a full-time trainer? A. Yes. Q. In that next paragraph it describes your benefits, benefit programs. Do you recall that, receiving benefits as a trainer? A. Yes. Q. And in that lower right-hand corner, is that your signature dated May 4, 2010? A. Yes. Q. If you go to the next page, did you make more as a trainer than you did as a financial planner? A. No, no.	2 3 4 5 6 7 8 9 10 11 12 13	Q. Do you ever remember Ms. Ellis encouraging you to apply for the promotion?  A. Not really. No. Q. If you go to the next page, it's "Vanguard 403(b)(7) New Account Form."  A. Okay. Q. Do you remember filling out this Vanguard paperwork while you worked for ECFMG?  A. Okay. Q. Do you recall that? A. Vaguely, yeah. Q. Is that your handwriting? A. Yes. Q. And if you could flip through this document.
112::34:54 112::34:56 112::34:50 112::34:50 112::34:30 112::34:30 112::34:34 112::34:34 112::34:31 112::34:31	2 3 4 5 6 7 8 9 10 11 12 13	A. Uh-huh. Q. So you got a significant increase from being part-time SP up to a full-time trainer? A. Yes. Q. In that next paragraph it describes your benefits, benefit programs. Do you recall that, receiving benefits as a trainer? A. Yes. Q. And in that lower right-hand corner, is that your signature dated May 4, 2010? A. Yes. Q. If you go to the next page, did you make more as a trainer than you did as a financial planner? A. No, no. Q. So what prompted you to quit doing financial	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. Do you ever remember Ms. Ellis encouraging you to apply for the promotion?  A. Not really. No. Q. If you go to the next page, it's "Vanguard 403(b)(7) New Account Form."  A. Okay. Q. Do you remember filling out this Vanguard paperwork while you worked for ECFMG?  A. Okay. Q. Do you recall that? A. Vaguely, yeah. Q. Is that your handwriting? A. Yes. Q. And if you could flip through this document I just want to make sure all of this document is you
112::34:54 112::34:56 112::34:20 112::34:20 112::34:30 112::34:34 112::34:34 112::34:34 112::34:34 112::34:40 112::34:40 112::34:40	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. Uh-huh. Q. So you got a significant increase from being part-time SP up to a full-time trainer? A. Yes. Q. In that next paragraph it describes your benefits, benefit programs. Do you recall that, receiving benefits as a trainer? A. Yes. Q. And in that lower right-hand corner, is that your signature dated May 4, 2010? A. Yes. Q. If you go to the next page, did you make more as a trainer than you did as a financial planner? A. No, no. Q. So what prompted you to quit doing financial planning?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. Do you ever remember Ms. Ellis encouraging you to apply for the promotion?  A. Not really. No. Q. If you go to the next page, it's "Vanguard 403(b)(7) New Account Form."  A. Okay. Q. Do you remember filling out this Vanguard paperwork while you worked for ECFMG?  A. Okay. Q. Do you recall that? A. Vaguely, yeah. Q. Is that your handwriting? A. Yes. Q. And if you could flip through this document I just want to make sure all of this document is you handwriting.
112::34:54 112::34:56 112::34:56 112::34:30 112::34:34 112::34:34 112::34:34 112::34:38 112::34:39 112::34:39 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. Uh-huh. Q. So you got a significant increase from being part-time SP up to a full-time trainer? A. Yes. Q. In that next paragraph it describes your benefits, benefit programs. Do you recall that, receiving benefits as a trainer? A. Yes. Q. And in that lower right-hand corner, is that your signature dated May 4, 2010? A. Yes. Q. If you go to the next page, did you make more as a trainer than you did as a financial planner? A. No, no. Q. So what prompted you to quit doing financial planning? A. The market crashed and I was a new I guess	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. Do you ever remember Ms. Ellis encouraging you to apply for the promotion?  A. Not really. No. Q. If you go to the next page, it's "Vanguard 403(b)(7) New Account Form."  A. Okay. Q. Do you remember filling out this Vanguard paperwork while you worked for ECFMG?  A. Okay. Q. Do you recall that? A. Vaguely, yeah. Q. Is that your handwriting? A. Yes. Q. And if you could flip through this document I just want to make sure all of this document is you handwriting. A. Uh-huh.
112::34:54 112::34:56 112::34:56 112::34:20 112::34:30 112::34:34 112::34:34 112::34:34 112::34:39 112::34:39 112::34:40 112::34:40 112::34:40 112::34:40 112::34:39	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Uh-huh. Q. So you got a significant increase from being part-time SP up to a full-time trainer? A. Yes. Q. In that next paragraph it describes your benefits, benefit programs. Do you recall that, receiving benefits as a trainer? A. Yes. Q. And in that lower right-hand corner, is that your signature dated May 4, 2010? A. Yes. Q. If you go to the next page, did you make more as a trainer than you did as a financial planner? A. No, no. Q. So what prompted you to quit doing financial planning? A. The market crashed and I was a new — I guess I had been in the business a couple of years. I didn't	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Do you ever remember Ms. Ellis encouraging you to apply for the promotion?  A. Not really. No. Q. If you go to the next page, it's "Vanguard 403(b)(7) New Account Form."  A. Okay. Q. Do you remember filling out this Vanguard paperwork while you worked for ECFMG?  A. Okay. Q. Do you recall that? A. Vaguely, yeah. Q. Is that your handwriting? A. Yes. Q. And if you could flip through this document I just want to make sure all of this document is you handwriting.  A. Uh-huh. Q. And if you turn to Page 5 of 8 in the bottom
112::34:54 112::34:56 112::34:56 112::34:20 112::34:30 112::34:34 112::34:34 112::34:39 112::34:39 112::34:40 112::34:40 112::34:40 112::34:40 112::34:50 112::34:50 112::34:50	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Uh-huh. Q. So you got a significant increase from being part-time SP up to a full-time trainer? A. Yes. Q. In that next paragraph it describes your benefits, benefit programs. Do you recall that, receiving benefits as a trainer? A. Yes. Q. And in that lower right-hand corner, is that your signature dated May 4, 2010? A. Yes. Q. If you go to the next page, did you make more as a trainer than you did as a financial planner? A. No, no. Q. So what prompted you to quit doing financial planning? A. The market crashed and I was a new I guess I had been in the business a couple of years. I didn't have a large enough book of business to survive that	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Do you ever remember Ms. Ellis encouraging you to apply for the promotion?  A. Not really. No. Q. If you go to the next page, it's "Vanguard 403(b)(7) New Account Form."  A. Okay. Q. Do you remember filling out this Vanguard paperwork while you worked for ECFMG?  A. Okay. Q. Do you recall that? A. Vaguely, yeah. Q. Is that your handwriting? A. Yes. Q. And if you could flip through this document I just want to make sure all of this document is you handwriting.  A. Uh-huh. Q. And if you turn to Page 5 of 8 in the bottom right-hand corner ECFMG-ELLIS 7205
112::34:54 112::34:56 112::34:56 112::34:56 112::34:50 112::34:30 112::34:34 112::34:34 112::34:39 112::34:40 112::34:40 112::34:40 112::34:40 112::34:54 112::34:59 112::34:59 112::34:59	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Uh-huh. Q. So you got a significant increase from being part-time SP up to a full-time trainer? A. Yes. Q. In that next paragraph it describes your benefits, benefit programs. Do you recall that, receiving benefits as a trainer? A. Yes. Q. And in that lower right-hand corner, is that your signature dated May 4, 2010? A. Yes. Q. If you go to the next page, did you make more as a trainer than you did as a financial planner? A. No, no. Q. So what prompted you to quit doing financial planning? A. The market crashed and I was a new I guess I had been in the business a couple of years. I didn't have a large enough book of business to survive that downturn, so that's why I was working two jobs.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. Do you ever remember Ms. Ellis encouraging you to apply for the promotion?  A. Not really. No. Q. If you go to the next page, it's "Vanguard 403(b)(7) New Account Form."  A. Okay. Q. Do you remember filling out this Vanguard paperwork while you worked for ECFMG?  A. Okay. Q. Do you recall that? A. Vaguely, yeah. Q. Is that your handwriting? A. Yes. Q. And if you could flip through this document I just want to make sure all of this document is you handwriting.  A. Uh-huh. Q. And if you turn to Page 5 of 8 in the bottom right-hand corner ECFMG-ELLIS 7205 A. Yes.
112::34:54 112::34:56 112::34:56 112::34:50 112::34:30 112::34:30 112::34:34 112::34:34 112::34:34 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Uh-huh. Q. So you got a significant increase from being part-time SP up to a full-time trainer?  A. Yes. Q. In that next paragraph it describes your benefits, benefit programs. Do you recall that, receiving benefits as a trainer?  A. Yes. Q. And in that lower right-hand corner, is that your signature dated May 4, 2010?  A. Yes. Q. If you go to the next page, did you make more as a trainer than you did as a financial planner?  A. No, no. Q. So what prompted you to quit doing financial planning?  A. The market crashed and I was a new — I guess I had been in the business a couple of years. I didn't have a large enough book of business to survive that downturn, so that's why I was working two jobs.  And I took this (indicating) as just an	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Do you ever remember Ms. Ellis encouraging you to apply for the promotion?  A. Not really. No. Q. If you go to the next page, it's "Vanguard 403(b)(7) New Account Form."  A. Okay. Q. Do you remember filling out this Vanguard paperwork while you worked for ECFMG?  A. Okay. Q. Do you recall that? A. Vaguely, yeah. Q. Is that your handwriting? A. Yes. Q. And if you could flip through this document I just want to make sure all of this document is you handwriting.  A. Uh-huh. Q. And if you turn to Page 5 of 8 in the bottom right-hand corner ECFMG-ELLIS 7205  A. Yes. Q under "Individuals," you listed
112::34:54 112::34:56 112::34:56 112::34:20 112::34:30 112::34:30 112::34:34 112::34:34 112::34:39 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:50 112::34:50 112::34:50 112::34:50	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Uh-huh. Q. So you got a significant increase from being part-time SP up to a full-time trainer? A. Yes. Q. In that next paragraph it describes your benefits, benefit programs. Do you recall that, receiving benefits as a trainer? A. Yes. Q. And in that lower right-hand corner, is that your signature dated May 4, 2010? A. Yes. Q. If you go to the next page, did you make more as a trainer than you did as a financial planner? A. No, no. Q. So what prompted you to quit doing financial planning? A. The market crashed and I was a new I guess I had been in the business a couple of years. I didn't have a large enough book of business to survive that downturn, so that's why I was working two jobs. And I took this (indicating) as just an opportunity to I went without I was a full	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Do you ever remember Ms. Ellis encouraging you to apply for the promotion?  A. Not really. No. Q. If you go to the next page, it's "Vanguard 403(b)(7) New Account Form."  A. Okay. Q. Do you remember filling out this Vanguard paperwork while you worked for ECFMG?  A. Okay. Q. Do you recall that? A. Vaguely, yeah. Q. Is that your handwriting? A. Yes. Q. And if you could flip through this document I just want to make sure all of this document is you handwriting.  A. Uh-huh. Q. And if you turn to Page 5 of 8 in the bottom right-hand corner ECFMG-ELLIS 7205  A. Yes. Q under "Individuals," you listed Brittani Bryant as a recipient of your 401(k), correct
112::34:54 112::34:56 112::34:56 112::34:20 112::34:30 112::34:30 112::34:34 112::34:34 112::34:39 112::34:40 112::35:00	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Uh-huh. Q. So you got a significant increase from being part-time SP up to a full-time trainer? A. Yes. Q. In that next paragraph it describes your benefits, benefit programs. Do you recall that, receiving benefits as a trainer? A. Yes. Q. And in that lower right-hand corner, is that your signature dated May 4, 2010? A. Yes. Q. If you go to the next page, did you make more as a trainer than you did as a financial planner? A. No, no. Q. So what prompted you to quit doing financial planning? A. The market crashed and I was a new I guess I had been in the business a couple of years. I didn't have a large enough book of business to survive that downturn, so that's why I was working two jobs. And I took this (indicating) as just an opportunity to I went without I was a full commission guy, and I went without commission for	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Do you ever remember Ms. Ellis encouraging you to apply for the promotion?  A. Not really. No. Q. If you go to the next page, it's "Vanguard 403(b)(7) New Account Form."  A. Okay. Q. Do you remember filling out this Vanguard paperwork while you worked for ECFMG?  A. Okay. Q. Do you recall that? A. Vaguely, yeah. Q. Is that your handwriting? A. Yes. Q. And if you could flip through this document I just want to make sure all of this document is you handwriting.  A. Uh-huh. Q. And if you turn to Page 5 of 8 in the bottom right-hand corner ECFMG-ELLIS 7205  A. Yes. Q under "Individuals," you listed Brittani Bryant as a recipient of your 401(k), correct A. Absolutely, yes.
112::34:54 112::34:56 112::34:56 112::34:20 112::34:30 112::34:30 112::34:34 112::34:34 112::34:39 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40 112::34:40	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Uh-huh. Q. So you got a significant increase from being part-time SP up to a full-time trainer? A. Yes. Q. In that next paragraph it describes your benefits, benefit programs. Do you recall that, receiving benefits as a trainer? A. Yes. Q. And in that lower right-hand corner, is that your signature dated May 4, 2010? A. Yes. Q. If you go to the next page, did you make more as a trainer than you did as a financial planner? A. No, no. Q. So what prompted you to quit doing financial planning? A. The market crashed and I was a new I guess I had been in the business a couple of years. I didn't have a large enough book of business to survive that downturn, so that's why I was working two jobs. And I took this (indicating) as just an opportunity to I went without I was a full	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. Do you ever remember Ms. Ellis encouraging you to apply for the promotion?  A. Not really. No. Q. If you go to the next page, it's "Vanguard 403(b)(7) New Account Form."  A. Okay. Q. Do you remember filling out this Vanguard paperwork while you worked for ECFMG?  A. Okay. Q. Do you recall that? A. Vaguely, yeah. Q. Is that your handwriting? A. Yes. Q. And if you could flip through this document I just want to make sure all of this document is you handwriting.  A. Uh-huh. Q. And if you turn to Page 5 of 8 in the bottom right-hand corner ECFMG-ELLIS 7205  A. Yes. Q under "Individuals," you listed Brittani Bryant as a recipient of your 401(k), correct

		74		76
12:33:22	1	A. That's my child. Absolutely.	1	Q. And do you remember what prompted this, this
12:33:59	2	THE VIDEOGRAPHER: Counsel, can you give		letter to Ms. Ellis and Mr. Biggs?
12:35:02	3	me a couple of minutes to change the tape?	3	A. I'm sure I was thanking them for the
12:39:07	4	MS. O'DRISCOLL: Yes.	4	interview.
12:44:05	5	THE VIDEOGRAPHER: 12:35. We are off	5	Q. Okay. Is this the interview that's related
12:35:08	. 6	the record.	6	to your promotion?
12:35:08	7	(Recess taken at 12:35 p.m., resuming at	7	A. I don't know. It had to be, if Briggs
12:44:08	8	12:41 p.m.)	8	was there. It could be.
12:44:00	9	THE VIDEOGRAPHER: 12:40. Back on	9	Q. Do you think it was related to you coming on
12:44:20	10	record, beginning Disc 2.	10	at ECFMG?
12:44:26	11	Q. (By Ms. O'Driscoll) Mr. Bryant, we're back	11	A. That's what I'm not sure of.
12:44:25	12	on the record just after a brief break.	12	Q. Do you know if Mr. Biggs was working at ECFMC
12:44:29	13	Do you remember how long your wife,	1.3	when you started?
12:44:20	14	Jackie, worked at ECFMG before you came to work there	? 14	A. That's what I'm trying to remember. I'm not
12:44:28	15	A. I would say she was there a year or so, but	15	sure if he was or not. Oh, I think he was I think
12:44:29	16	I'm not exactly. But she probably was there a year, I	16	he was a trainer at the time.
12:44:38	17	guess.	17	Q. When you started?
12:44:38	18	Q. And what was her position there?	18	A. Yeah, I think so. I think he was.
12:44:98	19	A. Proctor.	19	Q. And do you remember, would there have been a
12:44:55	20	Q. Was she a proctor the whole time?	20	reason that you would have interviewed with a trainer
12:44:53	21	A. I'm not sure. I'm not sure what she was	21	for your SP position?
12:44:56	22	hired for. That's what I remember her doing. I'm no	22	A. No, no. So this had to be for the promotion.
12:45:08	23	sure why she was there.	23	I don't remember exactly. It had to be for the
12:45:00	24	Q. And she still worked there, you said, when	24	promotion, then.
12:45:89	25	you came to work there?	25	Q. Do you ever remember interviewing at all with
		75	***********	77
122::415::53	1	A. Right. That's what she was doing when I	1	Ms. Ellis related to when you were initially hired as
122::415::559	2	worked there.	2	an SP?
122::4125::04	3	Q. And how did Jackie hear about that job? Did	3	A. No.
122::425::07	4	you say through Ms. Ellis?	4	Q. You said you interviewed with John Repasch?
122::425::08	5	A. No.	5	A. I didn't remember his name; but yeah, that
122::425::10	6	MS. HARROLD: Objection, speculation.	6	sounds right.
122::425:: PD	7	A. No, I have no idea how she heard about the	t 7	Q. Okay. Did you ever tell Mr. Repasch that you
122::425:: 29	8	job.	8	have a child with Ms. Ellis?
122::425::217	9	Q. (By Ms. O'Driscoll) What did Jackie do	9	A. No.
122::425::23	10	before she came to work at ECFMG?	10	Q. You understood that Ms. Ellis was the
122::4425:: 2:49	11	A. Sometimes nothing. She was a housewife	11	assistant center manager, second in command during that
122::425::29	12	sometimes. Sometimes she wasn't.	12	time period in 2008, in the fall of 2008?
122::425::32	13	Q. Did she work at a dental office?	13	A. Yes.
122::425::34	14	A. She has dental background.	14	Q. And you didn't mention that to Mr. Repasch?
122::425::48	1.5	Q. Do you know who hired Jackie?	15	A. No.
122::4125::500	16	A. No.	16	Q. I knew you said that Jackie helped you raise
122::426::5.9	17	Q. Do you ever remember Ms. Ellis introducing	17	Brittani along with Ms. Ellis. You mentioned that you
122::415::02	18	you to John Repasch, the former center manager?	18	bought a car for Brittani as a college graduation
122::415::25	19	A. I don't remember. I don't remember that.	19	present. Is that right?
122::415:: 128	20	Q. I will mark as Exhibit 6 ECFMG-ELLIS 721.		A. Yes, yes.
122::436::24	2.1	(Marked was Bryant Exhibit No. 6.)	21	Q. And was that during the time that Brittani
122::436::388	22	Q. (By Ms. O'Driscoll) If you could take a look	22	was living with you?
			23	A No Charmania cobool
122::435:: 29	2.3	at this document, is that your signature in the lower		A. No. She was in school.
12::45::29 12::45::55 12::46::57	23 24 25	right-hand corner?  A. Uh-huh, yes.	24 25	Q. I thought it was her college graduation present.

		78		80
112::48:39	1	A. It was.	1	MS. HARROLD: Objection, relevance.
12:49:38	2	Q. Had she started her graduate program?	2	A. Yeah, Christmas, birthdays. Gifts, yeah.
112::49:03	3	A. No. She was home for the holidays, I bought	3	But not support. She's pretty frugal, pretty sharp
12:45:48	4	it that Christmas. She was graduating the next spring.		kid, so
112:45:08	5	We just gave it to her then. She was still at UT.	5	Q. (By Ms. O'Driscoll) Okay. And you said you
12:45:39	6	Q. So it was an early graduation present?	6	heard that Artis left ECFMG at some point. You said
112::49:36	7	A. Yeah.	7	you didn't hear why she left?
12:45:38	8	Q. And you said "we gave it to her." Did you	8	A. Circumstances, I don't recall.
12:49:52	9	and Jackie buy that for her?	9	Q. Did you know that ECFMG had a policy in place
12:49:06	10	A. (Moving head up and down.)	10	against hiring relatives or anyone with a personal
12:49:09	11	Q. Did Jackie cosign on that car?	11	relationship?
12:30:06	12	A. I don't know.	12	A. No.
12:30:00	13	O. And that was a Honda?	13	Q. If a policy have you ever worked anywhere
112:30:06	14	A. Uh-huh.	14	that had a policy like that?
12:30:08	15	(	15	
	16	Q. Do you remember you said you thought it was around 2009?		A. I probably have, but never paid much
112:90:12	ì		16	attention to it.
112:90:19 112:90:26	17 18	A. I don't remember. Close to that, yeah. Q. And if you started working at ECFMG in 2008,	17 18	Q. As manager at your current employer, do you
	ŀ			ever make hiring decisions?
112:90:28	19	based on the documents that we reviewed, did that	19	A. Yes.
112:90:B9	20	refresh your recollection that you were working at	20	Q. And promotion decisions?
112::90:26	21	ECFMG in 2009 when you bought the car?	21	A. Yes.
112:30:28	22	A. I guess so, yes.	22	Q. And if you were ever interviewing if you
112::90:29	23	Q. And that was you said that Brittani lived	23	were interviewing Artis, if she was applying at your
112:30:30	24	with you for a period of time after college?	24	job, would you let your employer know that she was the
112::90:32	25	A. Uh-huh.	25	mother of your daughter?
		79		81
112::30:33	1	Q. Was that after she graduated from UT?	1	A. That's not relevant.
12:90:33 12:90:36	1 2		1 2	A. That's not relevant. Q. How is that not relevant?
	!	Q. Was that after she graduated from UT?		A. That's not relevant.
12:30:36	2	Q. Was that after she graduated from UT?  A. It was sometime after that. She didn't move	2	A. That's not relevant. Q. How is that not relevant?
12:90:36 12:90:36	2 3	Q. Was that after she graduated from UT?  A. It was sometime after that. She didn't move straight in with me. She lived by herself, then she	2	<ul><li>A. That's not relevant.</li><li>Q. How is that not relevant?</li><li>A. It's not relevant. I'm hiring her for her</li></ul>
12::90:36 12::90:36 12::90:46	2 3 4	Q. Was that after she graduated from UT?  A. It was sometime after that. She didn't move straight in with me. She lived by herself, then she had a roommate for a while. She got into so it	2 3 4	<ul> <li>A. That's not relevant.</li> <li>Q. How is that not relevant?</li> <li>A. It's not relevant. I'm hiring her for her skills, not her relationship.</li> </ul>
12:30:36 12:30:36 12:30:46 12:30:40	2 3 4 5	Q. Was that after she graduated from UT?  A. It was sometime after that. She didn't move straight in with me. She lived by herself, then she had a roommate for a while. She got into so it might have been after.	2 3 4 5	<ul> <li>A. That's not relevant.</li> <li>Q. How is that not relevant?</li> <li>A. It's not relevant. I'm hiring her for her skills, not her relationship.</li> <li>Q. But if there is a policy in place that states</li> </ul>
12:30:36 12:30:36 12:30:46 12:36:40	2 3 4 5 6	Q. Was that after she graduated from UT?  A. It was sometime after that. She didn't move straight in with me. She lived by herself, then she had a roommate for a while. She got into so it might have been after.  Because she got into a Ph.D. program at	2 3 4 5 6	A. That's not relevant. Q. How is that not relevant? A. It's not relevant. I'm hiring her for her skills, not her relationship. Q. But if there is a policy in place that states that you're supposed to divulge and disclose any
12:90:36 12:90:56 12:90:46 12:98:40 12:98:43	2 3 4 5 6 7	Q. Was that after she graduated from UT?  A. It was sometime after that. She didn't move straight in with me. She lived by herself, then she had a roommate for a while. She got into so it might have been after.  Because she got into a Ph.D. program at U of H. So I'm not I'm not sure. She was	2 3 4 5 6 7	A. That's not relevant. Q. How is that not relevant? A. It's not relevant. I'm hiring her for her skills, not her relationship. Q. But if there is a policy in place that states that you're supposed to divulge and disclose any personal relationships whatsoever, would you feel like
12:90:36 12:90:36 12:90:46 12:96:00 12:96:03 12:96:07	2 3 4 5 6 7 8	Q. Was that after she graduated from UT?  A. It was sometime after that. She didn't move straight in with me. She lived by herself, then she had a roommate for a while. She got into so it might have been after.  Because she got into a Ph.D. program at U of H. So I'm not I'm not sure. She was constantly in school during that time, so I'm not sure	2 3 4 5 6 7 8	A. That's not relevant. Q. How is that not relevant? A. It's not relevant. I'm hiring her for her skills, not her relationship. Q. But if there is a policy in place that states that you're supposed to divulge and disclose any personal relationships whatsoever, would you feel like you had an obligation to follow that policy?
12:30:36 12:30:36 12:30:46 12:36:40 12:36:43 12:36:43	2 3 4 5 6 7 8 9	Q. Was that after she graduated from UT?  A. It was sometime after that. She didn't move straight in with me. She lived by herself, then she had a roommate for a while. She got into so it might have been after.  Because she got into a Ph.D. program at U of H. So I'm not I'm not sure. She was constantly in school during that time, so I'm not sure of the time periods.	2 3 4 5 6 7 8 9	A. That's not relevant. Q. How is that not relevant? A. It's not relevant. I'm hiring her for her skills, not her relationship. Q. But if there is a policy in place that states that you're supposed to divulge and disclose any personal relationships whatsoever, would you feel like you had an obligation to follow that policy? A. No.
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		82		84
122:553::48	1	MS. HARROLD: Same objection.	1	A. Uh-huh.
1123:531::429	2	A. At my business we hire — on my site right	2	Q. So I just wanted to get clarification why
122:5531::44	3	now I have a father and three sons working there. I	3	there was actually a court order entered related to the
122:551::43	. 4	have a husband and a wife working for the same compan		child support issue.
1122:5531::49	5	there. I have a father and a daughter working for the	y <u> </u>	MS. HARROLD: Objection, relevance.
112:551::512	6		6	
122:531::98	7	exact same company on the exact same site.	7	Q. (By Ms. O'Driscoll) You can answer.
122:551::59	8	My son just went through a vigorous,	8	A. I don't know.
122:551::59	9	vigorous interview process that lasted weeks. They	9	Q. Do you recall?
122:554::017	10	still hired my son, same job site, same company.	10	A. I mean, yeah, I'm looking at it. Yeah, sure.
		Q. And you said you don't think your current		Q. Do you recall why there was a court order put
122:54:04	11 12	employer has a policy like that, correct?	11	in place?
122:54:09	İ	A. I know we don't. We have - yeah, I know we	12	MS. HARROLD: Objection, relevance.
122:54::56	13	don't.	13	Objection, asked and answered.
102:54:53	14	Q. So if ECFMG has a policy that requires that	14	A. We wanted to establish support for the child
122:554::56	15	personal relationships of any sort should be disclosed	15	I mean, it wasn't it was to establish support for
1122:5542::199	16	to prevent conflicts of interest, if that policy	16	Brittani, financial support.
1122:5542::218	17	exists, do you believe that that should have been	17	Q. (By Ms. O'Driscoll) But you had been paying
1122:554::23	18	disclosed?	18	child support all along, correct?
122:5542::24	19	A. No.	19	A. Absolutely.
1122:5542::24	20	MS. HARROLD: Objection, asked and	20	Q. Okay. All throughout her childhood?
1122:5542::274	21	answered. Objection, calls for speculation.	21	A. Absolutely.
1122:5542::25	22	A. I don't.	22	Q. And you were very involved in her upbringing
122:5542::36	23	Q. (By Ms. O'Driscoll) What about if the person	23	A. Sure.
1122:5542::3B	24	that's being hired is supervising that person in the	24	Q. And you worked with Ms. Ellis to raise
122:552::34	25	personal relationship?	25	Brittani?
	*******	83		85
.2:52:23	1	A. Absolutely.	1	A. Yes.
.2:52:23	2	MS. HARROLD: Objection, calls for	2	Q. And Jackie worked with you, also, and
.2:52:28	3	speculation.	3	Ms. Ellis
.2:52:23	4	Q. (By Ms. O'Driscoll) It should be divulged?	4	A. Yes.
.2:52:29	5	A. Yeah.	5	Q to raise Brittani?
.2:52:38	6	Q. One more exhibit. We will mark it as	6	A. Yes.
.2:52:32	7	Exhibit 7. This is ECFMG, first page is 6750.	7	Q. Have you understood all of my questions, sil?
.2:52:59	8	(Marked was Bryant Exhibit No. 7.)	8	A. I think I have.
.2:53:01	9	Q. (By Ms. O'Driscoll) Mr. Bryant, I know that	9	Q. Okay
.2:53:01	10	you testified that there was that you paid child	10	A. I've tried to.
.2:53:02		support for Brittani to Ms. Ellis.	11	Q. Okay.
.2:53:09	11 12	Do you recall any orders being entered by	12	MS. O'DRISCOLL: I will pass the
	ļ.			witness.
.2:53:05	13	the court related to child support?	13	
.2:53:08	14	A. Pardon me?	14	(Following proceeding commenced at 12:55 p.m.)
.2:59:08	1.5	Q. Do you recall any orders being signed by a	15	EXAMINATION
.2:53:22	16	judge in court	16	BY MS. HARROLD:
.2:59:23	17	A. Yes.	1.7	Q. IIi, Mr. Bryant. How are you?
.2:53:23	18	Q related to child support?	18	A. Tired.
.2:53:26	19	A. Yes.	19	Q. I understand, and I'm not going to try to
.2:53:26	20	Q. And do you remember why those orders were	20	keep you here very long. But my name is Keenya
.2:53:29	21	entered?	21	Harrold. I represent Ms. Ellis in the legal matter
.2:59:32	22	A. Why they were entered?	22	against ECFMG.
.2:55:23	23	Q. You had mentioned earlier that you and	23	I'm going to ask you a couple of
.2:55:28	24	Ms. Ellis had a very civil relationship and co-parente	d 24	questions, follow-up questions, but I understand that
.2:53:28	25	Brittani.	25	you have to get back to work.

		86		88
12:53:08	1	A. Uh-huh.	1	A. No.
12:53:30	2	Q. Let me first apologize for even you having to	2	Q. So you were not terminated for not listing
12:53:32	3	take out time to come down here and do a deposition,	3	Ms. Ellis on your application as a relative. Is that
12:53:40	4	one, about a one-night-stand that happened when you	4	right?
12:53:48	5	were 19 years old and a relationship with your daught	i	A. No.
12:53:43	6	that had nothing to do with your employment. So I	6	Q. And you were not terminated for not telling
12:53:28	7	apologize for making you come downtown.	7	John about Brittani. Is that right?
12:53:22	8	A. Thank you.	8	A. No.
12:53:29	9	MS. O'DRISCOLL: Objection, form.	9	Q. In fact, what caused you to leave ECFMG?
12:53:82	10	Assumes facts in evidence and mischaracterizes	10	A. I resigned.
12:53:22	11	evidence.	11	Q. And what caused you to resign?
12:53:53	1.2	Q. (By Ms. Harrold) During our five-minute	12	A. I was going back to industry. I had a better
12:53:95	13	conversation on yesterday you remember that I told y	ou 13	opportunity.
12:53:97	14	just to be honest in your deposition. Correct?	14	Q. And you listed Jackie on your application
12:53:50	15	A. Yes.	15	because she was your wife. Right?
12:55:52	16	Q. And I told you that the phone call was not to	16	A. Yes.
12:57:00	17	persuade you in any way. Is that right?	17	Q. So you consider your wife your relative. Is
12:58:06	18	A. Yes, ma'am.	18	that right?
12:58:06	19	Q. You testified earlier that you found out	19	A. Yes, yes.
12:58:09	20	about the part-time position from your wife. Is that	20	Q. Are you and Ms. Ellis relatives?
12:50:50	21	correct?	21	A. No, we're not.
12:58:50	22	A. Yes.	22	Q. Were you guys ever married?
12:58:54	23	Q. Not from Ms. Ellis?	23	A. No.
12:50:58	24	A. I did not, yes.	24	Q. In a domestic partnership of any kind?
12:56:58	25	Q. And Ms. Ellis did not interview you for that	25	A. No.
		87		89
1225%:39	1	part-time position. Is that correct?	. 1	Q. Are you guys related by blood?
122556:09	2	A. That's correct.	2	A. No.
1225%:02	3	Q. And do you remember reporting to Ms. Ellis	3	Q. Adoption?
122556:02	4	when you were working part-time?	4	A. No.
122556:06	5	MS. O'DRISCOLL: Objection, asked and	5	Q. So she's never been your spouse?
1225%:08	6	answered.	6	A. No.
1225%:09	7.	A. No, I remember reporting to the trainer an	<b>i</b> 7	Q. She definitely is not your child, right?
1225%:32	8	John. That's what I remember.	8	A. No, no.
1225%:32	9	Q. (By Ms. Harrold) And you testified that	9	Q. Not your grandchild?
1225%:39	1.0	Ms. Ellis did not interview you for the promotion,	10	A. No.
1225%:34	11	right? It was someone in Philadelphia?	11	Q. Not your parent?
1225%:13	12	MS. O'DRISCOLL: Objection, form.	12	A. No.
12:58:16	13	A. That's true.	13	Q. Grandparent?
1225%:13	14	MS. O'DRISCOLL: Mischaracterizes	14	A. No.
122556:13	15	evidence.	15	Q. Are you and Ms. Ellis siblings?
122556:20	16	Q. (By Ms. Harrold) Also, in regards to the	16	A. No.
122556:20	17	promotion, you found out about that promotion	17	Q. Are you her uncle?
122556:22	1.8	from did you find out from your wife? Or how did	18	A. No.
1225%:22	19	you find out about that promotion opportunity as a	19	Q. Is she your aunt?
122556:29	20	trainer?	20	A. No.
122556:24	21	A. Through the other trainers.	21	Q. What about, is she your niece?
122558:26	22	Q. So Ms. Ellis did not encourage you or tell	22	A. No.
1225587:26	23	you about that position. Is that right?	23	Q. Are you her nephew?
122557:23	24	A. No.	24	A. No.
122587:28	25	Q. Were you terminated from ECFMG?	25	Q. Are you guys cousins?
			·	

		90		92
02:58:29	1	A. No.	1	A. Yes.
L2:58:30	2	Q. Have you guys ever lived together?	2	Q. Okay.
02:50:32	3	A. No.	3	A. I've never ceased my relationship with my
02:50:33	4	Q. In an intimate, personal committed	4	daughter.
02:98:35	5	relationship?	5	Q. Okay. And that relationship with your
02:58:36	6	A. No.	6	daughter was also tied to Ms. Ellis because that was
02:58:30	7	Q. Were you guys in a relationship when you guy		her mother, correct?
02:58:38	8	were teenagers?	8	A. Not as an adult. No, that wouldn't be true
02:58:39	9	A. No.	9	as an adult. My daughter was away at college. I had
02:98:99	10	Q. Were you ever engaged to be married?	10	very little interaction with Ms. Ellis.
02:50:43	11	A. No.	11	Q. Well, you texted her on holidays and you
D2:50:43	12	Q. Do you consider Ms. Ellis to be your	12	talked with her on holidays. Correct?
02:50:46	13	significant other?	13	A. That's not a relationship. To me, that's not
02:50:47	14	A. No.	14	a relationship.
02:59:49	15	MS. HARROLD: I will pass the witness.	15	Q. Do you text strangers?
02:59:60	16	(Following proceeding commenced at 12:59 p.m.)	16	A. Absolutely not.
02:59:62	1.7	FURTHER EXAMINATION	17	Q. So co-parenting with someone, that is a
01:00:56	18	BY MS. O'DRISCOLL:	18	relationship, when you're co-parenting with someone,
02:59:63	19	Q. Mr. Bryant, I just have a couple of follow-up	19	correct?
121:59:69	20	questions.	20	A. Okay. Sure.
02:59:D0	21	Was Ms. Ellis involved in the orientation	21	Q. Do you agree with me?
02:59:02	22	and the paperwork when you were hired?	22	A. Sure.
02:99:03	23	A. I don't recall.	23	Q. And it would be also intimate to have a
02:59:27	24	Q. After the Philadelphia person interviewed you	24	sexual encounter with someone, wouldn't it?
02:59:29	25	for the promotion to trainer	25	A. Oh, yes.
		91		93
D2:09:30	1	A. Right.	1.	Q. And during the time period when you worked at
D2:59:30	2	Q you testified that you then interviewed	2	ECFMG, Ms. Ellis was the assistant manager and/or the
D2:09:32	3	with Ms. Ellis to receive that promotion. Correct?	3	center manager for that entire time?
02:09:39	4	A. Brent and Ms. Ellis, according to this	4	A. Yes, ma'am.
D2:09:29	5	(indicating).	5	Q. And that was a personal relationship that you
02:09:39	6	Q. And you testified, in fact, that you recalled	6	had Ms. Ellis in co-parenting Brittani, correct?
02:09:42	7	interviewing with Ms. Ellis for that promotion,	7	A. Yes.
02:09:55	8	correct?	8	MS. O'DRISCOLL: Pass the witness.
02:52:09	9	A. Brent and Ms. Ellis, yes.	9	(Following proceeding commenced at 1:02 p.m.)
02:02:06	10	Q. But Ms. Ellis was there?	10	FURTHER EXAMINATION
12:59:47	11	A. Yes.	11	BY MS. HARROLD:
02:02:48	12	Q. And to your knowledge, she approved the	12	Q. At the time that you were at ECFMG, Brittani
02:92:50	13	promotion. Correct?	13	was already in college. Is that right?
02:02:53	14	A. I would assume so.	14	A. Yeah.
02:02:55	1,5	Q. Well, I mean, based on the paperwork that we	15	MS. O'DRISCOLL: Objection. He
12:59:56	16	looked at, she signed off as your supervisor, didn't	16	A. I guess.
31:00:08	17	she?	17	MS. O'DRISCOLL: - wasn't sure of the
01:00:08	18	A. Okay, yeah, sure.	18	timing.
\$D:00:08	19	Q. You also mentioned that you and Ms. Ellis	19	Q. (By Ms. Harrold) At the time Brittani
01:00:09	20	were co-parenting Brittani throughout her childhood	- 20	graduated from the University of Texas in 2004. Does
01:00:24	21	A. Yes.	21	that sound right?
D1:00:23	22	Q and throughout growing up and throughout	22	MS. O'DRISCOLL: Objection. Facts not
IL:00:27	23	college, correct?	23	in evidence.
JN : 00 : 28	24	A. Sure.	24	MS. HARROLD: I'm asking him a question
01:00:29	25	Q. I mean, is that correct?	25	You asked if she graduated in 2009. I'm asking him a

		94		96
01:04:30	1	question. If he remembers now, then he remembers now	v. 1	Q and throughout college, throughout
01.:04:32	2	But let's see what he remembers, if she was in college	2	graduate school. Isn't that true?
011::04:35	3	at the time he was employed at ECFMG.	3	A. That's true.
O1.:: O4: 46	4	MS. O'DRISCOLL: That's fine. Ask your	4	Q. And you testified that you and Ms. Ellis
O11:: O4:10	5	question. I'm just saying it's not in evidence. He	5	worked very closely together and along with Jacquelyn
OD::O4:HH	6	hasn't testified to that. He actually said he didn't	6	your wife, to help raise Brittani. Correct?
OI :: O2 : 13	7	recall when she graduated.	7	A. Yes.
O1:04:18	8	Q. (By Ms. Harrold) Was Brittani in college at	8	Q. And during the time period that you said that
O11:: O4:58	9	the time that you were at ECFMG, if you remember?	9	she moved in with you after college
01:04:22	10	A. I don't think so.	10	A. Uh-huh.
O1::02:32	11	Q. So you think she was still in high school?	11	Q off and on for a couple of years she lived
01:04:24	12	A. No, she wasn't in high school.	12	with you
01:04:35	13	Q. So she was either in college or in graduate	13	A. Uh-huh.
OIL:04:28	14	school or	14	Q is it your testimony to the judge and jury
011:08:20	15	A. Either one. She was in I think she might	15	that you never communicated with Ms. Ellis about
011:08:32	16	have been in graduate school, but I don't recall.	16	Brittani or about co-parenting at all?
011:08:36	17	Q. So she was basically an adult?	17	A. I would suggest that. I had no reason to.
011:08:08	18	A. She was an adult. When she left her mother's	18	Q. You never communicated with Ms. Ellis
01:08:48	19	house to me, she was an adult.	1.9	A. About no.
011:08:42	20	Q. So she was not living in her mother's house	20	Q about Brittani?
011:08:42	21	when you were working at ECFMG?	21	A. I can't think of one, no. Not until she got
011:08:49	22	A. No, she hadn't no, no.	22	ready to get married.
01:04:16	23	Q. So then you didn't have a reason to talk to	23	Q. During the time period when Brittani was out
@11::OB:58	24	Ms. Ellis	24	of college and living with you, you wouldn't
01:03:20	25	A. I didn't.	25	A. No.
		95		97
01:03:28	1	Q about Brittani while you were working at	1	Q communicate with Ms. Ellis?
01:03:28	2	ECFMG, right?	2	A. No. No, Brittani, she was living with me. I
01:03:22	3	MS. O'DRISCOLL: Objection, form.	3	communicated with Brittani.
01:03:22	4	A. No, that's true. That's true.		
01:03:29	5	A. No, mar stille. That strue.	1	
		O (By Me Harrold) And the only time that you	4	Q. Did you let Ms. Ellis know that you bought
	1	Q. (By Ms. Harrold) And the only time that you and Ms. Ellis had an intimate encounter was when you	5	Q. Did you let Ms. Ellis know that you bought Brittani a car?
01:09:08	6	and Ms. Ellis had an intimate encounter was when you	5 6	Q. Did you let Ms. Ellis know that you bought Brittani a car?  A. No. Brittani drove up in a no, I didn't.
01:05:08 01:05:80	6 7	and Ms. Ellis had an intimate encounter was when you were 19 years old. Is that right?	5 6 7	Q. Did you let Ms. Ellis know that you bought Brittani a car?  A. No. Brittani drove up in a no, I didn't. I didn't need her permission to buy her a car.
01:05:08 01:05:30 01:03:35	6 7 8	and Ms. Ellis had an intimate encounter was when you were 19 years old. Is that right?  A. That is true.	5 6 7 8	<ul> <li>Q. Did you let Ms. Ellis know that you bought Brittani a car?</li> <li>A. No. Brittani drove up in a no, I didn't.</li> <li>I didn't need her permission to buy her a car.</li> <li>Q. I'm not saying you had to ask permission.</li> </ul>
01:05:00 01:05:30 01:09:35 01:03:34	6 7 8 9	and Ms. Ellis had an intimate encounter was when you were 19 years old. Is that right?  A. That is true.  Q. About 27 years ago. Is that correct?	5 6 7 8 9	Q. Did you let Ms. Ellis know that you bought Brittani a car?  A. No. Brittani drove up in a no, I didn't. I didn't need her permission to buy her a car. Q. I'm not saying you had to ask permission. A. No.
01:05:00 01:05:30 01:05:30 01:03:34 01:03:36	6 7 8 9 10	and Ms. Ellis had an intimate encounter was when you were 19 years old. Is that right?  A. That is true.  Q. About 27 years ago. Is that correct?  A. That is true.	5 6 7 8 9	<ul> <li>Q. Did you let Ms. Ellis know that you bought</li> <li>Brittani a car?</li> <li>A. No. Brittani drove up in a no, I didn't.</li> <li>I didn't need her permission to buy her a car.</li> <li>Q. I'm not saying you had to ask permission.</li> <li>A. No.</li> <li>Q. I'm saying as co-parenting</li> </ul>
01:05:00 01:05:30 01:05:35 01:03:34 01:05:36 01:05:39	6 7 8 9 10 11	and Ms. Ellis had an intimate encounter was when you were 19 years old. Is that right?  A. That is true. Q. About 27 years ago. Is that correct? A. That is true. Q. But you guys did not have an intimate	5 6 7 8 9 10 11	<ul> <li>Q. Did you let Ms. Ellis know that you bought</li> <li>Brittani a car?</li> <li>A. No. Brittani drove up in a no, I didn't.</li> <li>I didn't need her permission to buy her a car.</li> <li>Q. I'm not saying you had to ask permission.</li> <li>A. No.</li> <li>Q. I'm saying as co-parenting</li> <li>A. No, I did not.</li> </ul>
01:03:08 01:03:30 01:03:33 01:03:34 01:03:36 01:03:39 01:03:29	6 7 8 9 10 11 12	and Ms. Ellis had an intimate encounter was when you were 19 years old. Is that right?  A. That is true.  Q. About 27 years ago. Is that correct?  A. That is true.  Q. But you guys did not have an intimate relationship when you were working at ECFMG. Righ	5 6 7 8 9 10 11	<ul> <li>Q. Did you let Ms. Ellis know that you bought</li> <li>Brittani a car?</li> <li>A. No. Brittani drove up in a no, I didn't.</li> <li>I didn't need her permission to buy her a car.</li> <li>Q. I'm not saying you had to ask permission.</li> <li>A. No.</li> <li>Q. I'm saying as co-parenting</li> <li>A. No, I did not.</li> <li>Q a child</li> </ul>
01:03:28 01:03:38 01:03:35 01:03:34 01:03:36 01:03:39 01:03:29 01:03:22	6 7 8 9 10 11 12 13	and Ms. Ellis had an intimate encounter was when you were 19 years old. Is that right?  A. That is true.  Q. About 27 years ago. Is that correct?  A. That is true.  Q. But you guys did not have an intimate relationship when you were working at ECFMG. Right A. No, we did not.	5 6 7 8 9 10 11 t? 12	<ul> <li>Q. Did you let Ms. Ellis know that you bought Brittani a car?</li> <li>A. No. Brittani drove up in a no, I didn't.</li> <li>I didn't need her permission to buy her a car.</li> <li>Q. I'm not saying you had to ask permission.</li> <li>A. No.</li> <li>Q. I'm saying as co-parenting</li> <li>A. No, I did not.</li> <li>Q a child</li> <li>A. I did not consult her on buying Brittani a</li> </ul>
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01:05:00 01:05:30 01:05:30 01:03:34 01:03:30 01:03:30 01:03:20 01:03:20 01:03:20 01:03:20	6 7 8 9 10 11 12 13 14	and Ms. Ellis had an intimate encounter was when you were 19 years old. Is that right?  A. That is true. Q. About 27 years ago. Is that correct? A. That is true. Q. But you guys did not have an intimate relationship when you were working at ECFMG. Right A. No, we did not.  MS. O'DRISCOLL: Objection, form. A. We did not.	5 6 7 8 9 10 11 t? 12 13 14	Q. Did you let Ms. Ellis know that you bought Brittani a car?  A. No. Brittani drove up in a no, I didn't. I didn't need her permission to buy her a car. Q. I'm not saying you had to ask permission. A. No. Q. I'm saying as co-parenting A. No, I did not. Q a child A. I did not consult her on buying Brittani a car. Q. But did you let her know that you bought her
01:05:00 01:05:30 01:05:30 01:03:34 01:03:30 01:03:30 01:05:20 01:05:22 01:05:25 01:05:25	6 7 8 9 10 11 12 13 14 15 16	and Ms. Ellis had an intimate encounter was when you were 19 years old. Is that right?  A. That is true. Q. About 27 years ago. Is that correct? A. That is true. Q. But you guys did not have an intimate relationship when you were working at ECFMG. Right A. No, we did not.  MS. O'DRISCOLL: Objection, form. A. We did not. MS. HARROLD: No further questions.	5 6 7 8 9 10 11 t? 12 13 14 15	Q. Did you let Ms. Ellis know that you bought Brittani a car?  A. No. Brittani drove up in a no, I didn't. I didn't need her permission to buy her a car.  Q. I'm not saying you had to ask permission.  A. No.  Q. I'm saying as co-parenting A. No, I did not. Q a child A. I did not consult her on buying Brittani a car.  Q. But did you let her know that you bought her a car?
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01:05:00 01:05:30 01:05:30 01:03:34 01:05:30 01:05:30 01:05:20 01:05:20 01:05:20 01:05:20 01:05:20 01:05:20	6 7 8 9 10 11 12 13 14 15 16 17	and Ms. Ellis had an intimate encounter was when you were 19 years old. Is that right?  A. That is true. Q. About 27 years ago. Is that correct? A. That is true. Q. But you guys did not have an intimate relationship when you were working at ECFMG. Right A. No, we did not. MS. O'DRISCOLL: Objection, form. A. We did not. MS. HARROLD: No further questions. (Following proceeding commenced at 1:03 p.m.) FURTHER EXAMINATION	5 6 7 8 9 10 11 4? 12 13 14 15 16 17	Q. Did you let Ms. Ellis know that you bought Brittani a car?  A. No. Brittani drove up in a no, I didn't. I didn't need her permission to buy her a car.  Q. I'm not saying you had to ask permission.  A. No.  Q. I'm saying as co-parenting  A. No, I did not.  Q a child  A. I did not consult her on buying Brittani a car.  Q. But did you let her know that you bought her a car?  A. I'm sure after I gave it to her. I'm sure after I gave it to her, she found out she had a car.
01:03:08 01:03:30 01:03:34 01:03:36 01:03:36 01:03:39 01:03:29 01:03:28 01:03:28 01:03:26 01:03:26 01:03:27 01:03:28	6 7 8 9 10 11 12 13 14 15 16 17 18	and Ms. Ellis had an intimate encounter was when you were 19 years old. Is that right?  A. That is true. Q. About 27 years ago. Is that correct? A. That is true. Q. But you guys did not have an intimate relationship when you were working at ECFMG. Right A. No, we did not. MS. O'DRISCOLL: Objection, form. A. We did not. MS. HARROLD: No further questions. (Following proceeding commenced at 1:03 p.m.) FURTHER EXAMINATION BY MS. O'DRISCOLL:	5 6 7 8 9 10 11 4? 12 13 14 15 16 17 18	Q. Did you let Ms. Ellis know that you bought Brittani a car?  A. No. Brittani drove up in a no, I didn't. I didn't need her permission to buy her a car.  Q. I'm not saying you had to ask permission.  A. No.  Q. I'm saying as co-parenting  A. No, I did not.  Q a child  A. I did not consult her on buying Brittani a car.  Q. But did you let her know that you bought her a car?  A. I'm sure after I gave it to her. I'm sure after I gave it to her, she found out she had a car. I'm not sure how she found out. I didn't tell her.
01:03:08 01:03:39 01:03:34 01:03:36 01:03:36 01:03:39 01:03:29 01:03:29 01:03:28 01:03:28 01:03:28 01:03:28 01:03:36 01:05:30 01:05:34 01:05:36	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	and Ms. Ellis had an intimate encounter was when you were 19 years old. Is that right?  A. That is true. Q. About 27 years ago. Is that correct? A. That is true. Q. But you guys did not have an intimate relationship when you were working at ECFMG. Right A. No, we did not. MS. O'DRISCOLL: Objection, form. A. We did not. MS. HARROLD: No further questions. (Following proceeding commenced at 1:03 p.m.) FURTHER EXAMINATION BY MS. O'DRISCOLL: Q. Just a couple of follow-up questions,	5 6 7 8 9 10 11 4? 12 13 14 15 16 17 18 19 20	Q. Did you let Ms. Ellis know that you bought Brittani a car?  A. No. Brittani drove up in a no, I didn't. I didn't need her permission to buy her a car. Q. I'm not saying you had to ask permission. A. No. Q. I'm saying as co-parenting A. No, I did not. Q a child A. I did not consult her on buying Brittani a car. Q. But did you let her know that you bought her a car? A. I'm sure after I gave it to her. I'm sure after I gave it to her, she found out she had a car. I'm not sure how she found out. I didn't tell her. There was no reason for me to tell her.
01:05:08 01:05:30 01:05:30 01:03:34 01:03:36 01:03:36 01:03:29 01:03:29 01:03:25 01:03:26 01:05:36 01:05:36 01:05:34 01:05:36 01:05:38	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	and Ms. Ellis had an intimate encounter was when you were 19 years old. Is that right?  A. That is true. Q. About 27 years ago. Is that correct? A. That is true. Q. But you guys did not have an intimate relationship when you were working at ECFMG. Right A. No, we did not. MS. O'DRISCOLL: Objection, form. A. We did not. MS. HARROLD: No further questions. (Following proceeding commenced at 1:03 p.m.) FURTHER EXAMINATION BY MS. O'DRISCOLL: Q. Just a couple of follow-up questions, Mr. Bryant.	5 6 7 8 9 10 11 t? 12 13 14 15 16 17 18 19 20 21	Q. Did you let Ms. Ellis know that you bought Brittani a car?  A. No. Brittani drove up in a no, I didn't. I didn't need her permission to buy her a car.  Q. I'm not saying you had to ask permission.  A. No.  Q. I'm saying as co-parenting  A. No, I did not.  Q a child  A. I did not consult her on buying Brittani a car.  Q. But did you let her know that you bought her a car?  A. I'm sure after I gave it to her. I'm sure after I gave it to her, she found out she had a car. I'm not sure how she found out. I didn't tell her. There was no reason for me to tell her.  Q. But you said that even up until this day that
01:03:08 01:03:30 01:03:34 01:03:36 01:03:37 01:03:29 01:03:29 01:03:28 01:03:28 01:03:28 01:03:30 01:03:30 01:03:30 01:05:30 01:05:34 01:03:36 01:03:38	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	and Ms. Ellis had an intimate encounter was when you were 19 years old. Is that right?  A. That is true. Q. About 27 years ago. Is that correct? A. That is true. Q. But you guys did not have an intimate relationship when you were working at ECFMG. Right A. No, we did not. MS. O'DRISCOLL: Objection, form. A. We did not. MS. HARROLD: No further questions. (Following proceeding commenced at 1:03 p.m.) FURTHER EXAMINATION BY MS. O'DRISCOLL: Q. Just a couple of follow-up questions, Mr. Bryant. You testified earlier under oath, in	5 6 7 8 9 10 11 4? 12 13 14 15 16 17 18 19 20 21 22	Q. Did you let Ms. Ellis know that you bought Brittani a car?  A. No. Brittani drove up in a no, I didn't. I didn't need her permission to buy her a car.  Q. I'm not saying you had to ask permission.  A. No.  Q. I'm saying as co-parenting A. No, I did not. Q a child A. I did not consult her on buying Brittani a car.  Q. But did you let her know that you bought her a car?  A. I'm sure after I gave it to her. I'm sure after I gave it to her, she found out she had a car. I'm not sure how she found out. I didn't tell her.  There was no reason for me to tell her.  Q. But you said that even up until this day that you continue to text and call Ms. Ellis on holidays.
01:05:00 01:05:30 01:05:30 01:03:34 01:03:30 01:03:30 01:03:20 01:03:20 01:03:20 01:03:20 01:03:20 01:03:20 01:03:20 01:05:30 01:05:34 01:05:34 01:05:36 01:05:38	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	and Ms. Ellis had an intimate encounter was when you were 19 years old. Is that right?  A. That is true. Q. About 27 years ago. Is that correct? A. That is true. Q. But you guys did not have an intimate relationship when you were working at ECFMG. Right A. No, we did not. MS. O'DRISCOLL: Objection, form. A. We did not. MS. HARROLD: No further questions. (Following proceeding commenced at 1:03 p.m.) FURTHER EXAMINATION BY MS. O'DRISCOLL: Q. Just a couple of follow-up questions, Mr. Bryant. You testified earlier under oath, in front of a judge and jury, that you've been very active	5 6 7 8 9 10 11 4? 12 13 14 15 16 17 18 19 20 21 22 23	Q. Did you let Ms. Ellis know that you bought Brittani a car?  A. No. Brittani drove up in a no, I didn't.  I didn't need her permission to buy her a car.  Q. I'm not saying you had to ask permission.  A. No.  Q. I'm saying as co-parenting A. No, I did not.  Q a child A. I did not consult her on buying Brittani a car.  Q. But did you let her know that you bought her a car?  A. I'm sure after I gave it to her. I'm sure after I gave it to her, she found out she had a car. I'm not sure how she found out. I didn't tell her.  There was no reason for me to tell her.  Q. But you said that even up until this day that you continue to text and call Ms. Ellis on holidays. That's what you testified.
01:03:08 01:03:30 01:03:34 01:03:36 01:03:37 01:03:29 01:03:29 01:03:28 01:03:28 01:03:28 01:03:30 01:03:30 01:03:30 01:03:30 01:03:30	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	and Ms. Ellis had an intimate encounter was when you were 19 years old. Is that right?  A. That is true. Q. About 27 years ago. Is that correct? A. That is true. Q. But you guys did not have an intimate relationship when you were working at ECFMG. Right A. No, we did not. MS. O'DRISCOLL: Objection, form. A. We did not. MS. HARROLD: No further questions. (Following proceeding commenced at 1:03 p.m.) FURTHER EXAMINATION BY MS. O'DRISCOLL: Q. Just a couple of follow-up questions, Mr. Bryant. You testified earlier under oath, in	5 6 7 8 9 10 11 4? 12 13 14 15 16 17 18 19 20 21 22	Q. Did you let Ms. Ellis know that you bought Brittani a car?  A. No. Brittani drove up in a no, I didn't. I didn't need her permission to buy her a car.  Q. I'm not saying you had to ask permission.  A. No.  Q. I'm saying as co-parenting A. No, I did not. Q a child A. I did not consult her on buying Brittani a car.  Q. But did you let her know that you bought her a car?  A. I'm sure after I gave it to her. I'm sure after I gave it to her, she found out she had a car. I'm not sure how she found out. I didn't tell her.  There was no reason for me to tell her.  Q. But you said that even up until this day that you continue to text and call Ms. Ellis on holidays.

		98		100
D11::OB:34	1	been the holidays the last time I texted her or her	1	Q. Okay. Well, your opinion is that you stayed
DII::OB:33	2	husband. Just, you know, all of my contacts, I say,	2	involved
D11::OT = B8	3	"Happy Holidays" to.	3	A. Yes.
011::005::09	4	Q. But you already testified that you had a	4	Q throughout her childhood
011::075::06	5	personal relationship with Ms. Ellis in co-parenting	5	A. Yes, absolutely.
011::075:49	6	Brittani.	6	Q into her adulthood, into college, and to
011::075:48	7	A. I did.	7	getting married, to present day. Correct?
011::075:46	8	Q. Because your Brittani's father, correct?	8	A. Yes, ma'am.
011::075:46	9	A. Yes.	9	Q. You continued to pay child support until she
011::075:49	10	Q. And she's Brittani's mother?	10	was 18, right?
011::075:49	11	A. Yes. That's absolutely true. During the	11	A. Sure.
01::03:40	12	formative years, yes.	12	Q. You continued to have visitation all
D11::075:32	13	Q. That's contrary to your testimony a little	13	throughout her childhood until she was 18. Correct?
D11::075:23	14	while ago.	14	A. Yes.
011::075:25	15	A. Okay.	15	Q. And you continued to have that close
U11::075:29	16	Q. You said throughout the time, co-parenting	16	relationship with your daughter as you were
DD::08:QV	17	throughout childhood	17	co-parenting. Correct?
DD::08:22	18	A. That's true.	18	A. Yes.
D1::08: B5	19	Q throughout college, even into adulthood,	19	Q. Okay.
011::08: 85	20	that's what you testified a little while ago. Are you	20	MS. O'DRISCOLL: Reserve the rest of our
DU::0085 : BE	21	changing your testimony?	21	questions for trial.
01:06:37	22	A. No. I would suggest that we're co-parenting	22	MS. HARROLD: I have a few more
01:06:40	23	right now; but I haven't seen the woman all year. I'	n 23	questions.
01:06:44	24	always I'm going to always co-parent with her.	2.4	MS. O'DRISCOLL: Okay.
)1:08:17	25	That's my child.	25	(Following proceeding commenced at 1:08 p.m.)
		99		101
	1	Q. Right.	1	FURTHER EXAMINATION
01:06:47	2	A. I can't avoid that.	2	BY MS. HARROLD:
01:06:28	3	Q. Right.	3	Q. So the relationship that you were talking
01:06:22	4	A. So I'm not sure if you rephrase your	4	about is the relationship between you and Brittani. Is
01:08:20	5	question. I'm not sure where you're going with that	l	that right?
01:06:24	6	I'm never going to not be in Brittani's life.	6	A. Yes.
01:08:93	7	Q. Exactly. You'll always	7	Q. And you do you have a relationship did
01:06:28	8	A. So how can I not do it then? How can I not	8	you have a relationship with Ms. Ellis after Brittani
01:06:57	9	do it?	9	graduated from high school and went on to college?
01:06:54	10	Q. I just wanted to clarify your level of	10	MS. O'DRISCOLL: Objection, asked and
01:08:66	11	involvement in your daughter's relationship.	11	answered.
01:08:62	12	A. It's as intimate as it could be with a father	12	A. No.
01:08:02	13	and a daughter.	13	Q. (By Ms. Harrold) And the text messages that
01:08:06	14	Q. Okay. Very close?	14	you sent to Ms. Ellis on holidays, are those usually
01:08:47	15	A. Absolutely.	15	group text messages that you send to everybody on your
01:00:44	16	Q. So if Ms. Ellis testified that you were	1.6	phone?
01:00:11	17	barely involved in Brittani's upbringing, that would be	1	A. Yes.
01:08:48	18	false, wouldn't it?	18	Q. So that is not showing a relationship between
01:00:10	19	A. I have no idea what her perspective is. I	19	the two of you but just simply something you do to the
01:00:50	20	know what my relationship is with my daughter.	20	contacts in your phone. Is that right?
01:08:28	21	Q. If Ms. Ellis testified that you were hardly	21	MS. O'DRISCOLL: Objection, form.
01:00:20	22	involved in her life after the age of 12, that would be	22	A. Yes. Yes.
01:00:20	23	false, would it?	23	MS. HARROLD: We have no further
01:07:02	24	A. That's her opinion. That's not my that's	24	questions.
01:09:03	25	not my perspective.	25	(Following proceeding commenced at 1:09 p.m.)
		K K		, J

01:09:28 01:09:31 01:09:33 01:09:33

	102		10
1	MS. O'DRISCOLL: We will reserve our	1	IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS
2	questions for trial.	2	HOUSTON DIVISION
3	Thank you, Mr. Bryant.	3	ARTIS ELLIS, :
4	THE VIDEOGRAPHER: 1:09. We are off	he	:
5	record.	4	Plaintiff, :
6	(Proceedings concluded at 1:09 p.m.)	5	; Vs. :
7	* * *	,	: CIVIL ACTION NO.
8		6	EDUCATIONAL COMMISSION : 4:14-cv-02126
9			FOR FOREIGN MEDICAL :
10		7	GRADUATES, :
		8	: Defendant. :
11		9	REPORTER'S CERTIFICATION
12			VIDEOTAPED / REALTIMED DEPOSITION (
13		10	TROI A. BRYANT
14			SEPTEMBER 8, 2016
15		11 12	I, Pat English-Arredondo, CSR, RMR, CRR, CLR,
16		13	Certified Shorthand Reporter in and for the State of
17		14	Texas, hereby certify to the following:
18		15	that the witness, TROI A. BRYANT, was duly swo
19		16 17	the officer and that the transcript of the oral deposition is a true record of the testimony given by
20		18	the witness;
21		19	I further certify that pursuant to FRCP Rule
22		20	30(f)(1) that the signature of the deponent:
23		21 22	x was requested by the deponent or a party before the completion of the deposition and returned
24		23	within 30 days from date of receipt of the transcript.
25		24	If returned, the attached Changes and Signature Page
23		25	contains any changes and the reasons therefor;
	103		10
1	Artis Ellis vs.	1	was not requested by the deponent or a party
	Educational Commission for Foreign Medical Graduate		before the completion of the deposition.
2		3	I further certify that I am neither counsel for,
3	VIDEOTAPED / REALTIMED DEPOSITION OF TROI A. BRYANT		related to, nor employed by any of the parties or
3	SEPTEMBER 8, 2016	5	attorneys in the action in which this proceeding was taken, and further that I am not financially or
4	SEI ILIMBER 6, 2010	7	otherwise interested in the outcome of the action.
	CHANGES AND SIGNATURE	8	Certified to by me this 13th day of September,
5		9	2016.
	PAGE LINE CHANGE REASON	10	SUICA
6		_ 11	
7 8		12	Out English-arredonds
9		12	
10		13	Pat English-Arredondo, CSR, RMR, CRR, CLF Texas CSR No. 3828
11		- 14	Expiration Date: 12/31/2017
12		F -	DepoTexas, Inc.
13 14		- 15	Firm Registration No. 95
15		<u> </u>	13101 Northwest Freeway, Suite 210
16		_ 16	Houston, Texas 77040
17		4.7	Phone: 888.893.3767
18		$\begin{bmatrix} 17 \\ 18 \end{bmatrix}$	
19	1 TDOM A DDV AME have good the formation	19	
20 21	I, TROI A. BRYANT, have read the foregoing deposition and hereby affix my signature that same is	20	
22	true and correct, except as noted above.	21	
23		22	
	TROI A. BRYANT	23	
		24	
24 25	Job No.: 299093	25	Job No. 299093

AO 88A (Rev. 02/14) Subpoena to Testify at a Deposition in a Civil Action

whom it is directed. Fed. R. Civ. P. 45(a)(4).

# UNITED STATES DISTRICT COURT

for the

	ioi inc
ARTIS ELLIS  Plaintiff  v.  EDUCATIONAL COMMISSION FOR FOREIGN MEDICAL GRADUATES  Defendant	) ) Civil Action No. 4:14-cv-02126 ) )
SUBPOENA TO TESTIFY AT	A DEPOSITION IN A CIVIL ACTION
To: TROI BRYANT, 3318 L	a Mer Lane, Spring, Texas 77338-4145 here he may be found
(Name of person	to whom this subpoena is directed)
deposition to be taken in this civil action. If you are an	pear at the time, date, and place set forth below to testify at a organization, you must designate one or more officers, directors, asent to testify on your behalf about the following matters, or
Place: Morgan, Lewis & Bockius LLP, 1000 Louisiana Suite 4000, Houston, TX 77002	Date and Time: 09/08/2016 11:00 am
The deposition will be recorded by this method	STENOGRAPHICALLY AND BY VIDEOTAPE
	t also bring with you to the deposition the following documents, id must permit inspection, copying, testing, or sampling of the
Rule 45(d), relating to your protection as a person subjection to this subpoena and the potential consequence	are attached – Rule 45(c), relating to the place of compliance; set to a subpoena; and Rule 45(e) and (g), relating to your duty to s of not doing so.
Date: 08/23/2016 CLERK OF COURT	
obbiat of cooki	OR Stafania P. Mall
Signature of Clerk or Deput	stefanie R. Moll  ty Clerk  Attorney's signature
The name, address, e-mail address, and telephone numb COMMISSION FOR FOREIGN MEDICAL GRADUATE STEFANIE R. MOLL, MORGAN, LEWIS & BOCKIUS, 10 713-890-5000 STEFANIE.MOLL@MORGANLEWIS.CO	per of the attorney representing (name of party) EDUCATIONAL S, who issues or requests this subpoena, are: 000 LOUISIANA, SUITE 4000, HOUSTON, TEXAS 77002;
If this subpoena commands the production of document	o issues or requests this subpoena ts, electronically stored information, or tangible things before d on each party in this case before it is served

AO 88A (Rev.	02/14) Subpoena t	o Testify	at a Deposit	ion in a Civil A	ction (Page 2)					<del></del>	
Civil Action	No. 4:14-c	v-02126	}								
				PR	OOF OF S	ERVICE					
	(This see	ction sh	ould no				equired b	y Fed. R	. Civ. P. 45.)		
l rec	ceived this su	bpoena					TROI	^	ant		iddin y ganla ta y dalaren
<b>c</b> 1	served the su	abpoena	by deli	vering a co	py to the na	med indiv	idual as f	ollows:	to MR.	Troi	BRYa
at	3318	La	Mex	lone	Spr	15 TS	Z 773 (dase) 9	38	Chauni	Car	45)
0 1	returned the	subpoe	na unexe	ecuted beca	use:						
									s or agents, I h		
My fees are	\$		fo	r travel and	1\$		for service	es, for a	total of \$	0.00	
	clare under p		of perjur	y that this i	nformation	is true.	Server's	signature	Authorized P	D A GARZ	s Server
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							Server'	s address		770	192
Additional i	information r	egardin	g attemp	ted service	, etc.:						
	Non	R.	B	9	ノエ						
Troi	A.	Bri	500°	f T							

#### Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

#### (c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer, or (ii) is commanded to attend a trial and would not incur substantial

#### (2) For Other Discovery. A subpoena may command:

(A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises at the premises to be inspected.

#### (d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorncy responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees-on a party or attorney who fails to comply.

#### (2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises-or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an

order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

#### (3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that
  - (i) fails to allow a reasonable time to comply;

(ii) requires a person to comply beyond the geographical limits specified in Rule 45(c),

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) When Permitted To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

#### (e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information.
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The erson responding need not produce the same electronically stored

information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

#### (2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must

(i) expressly make the claim; and
(ii) describe the nature of the withheld documents, communications, or
tangible things in a manner that, without revealing information itself
privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has, must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court-may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

AO 88A (Rev 02/14) Subpoena to Testify at a Deposition in a Civil Action

whom it is directed. Fed. R. Civ. P. 45(a)(4).

# **UNITED STATES DISTRICT COURT**

for the

	ARTIS ELLIS  Plaintiff  V.  EDUCATIONAL COMMISSION FOR FOREIGN MEDICAL GRADUATES  Defendant  )	Civil Action No. 4:14-cv-02126					
	SUBPOENA TO TESTIFY AT A DEPO	SITION IN A CIVIL ACTION					
To:	TROI BRYANT, 3318 La Mer Lane, Spring, Texas 77338-4145 or where he may be found						
	(Name of person to whom t	is subpoena is directed)					
depositi or mana	Testimony: YOU ARE COMMANDED to appear at the font to be taken in this civil action. If you are an organizating agents, or designate other persons who consent to test forth in an attachment:	tion, you must designate one or more officers, directors,					
Place:	Morgan, Lewis & Bockius LLP, 1000 Louisiana, Suite 4000, Houston, TX 77002	Date and Time: 09/08/2016 11:00 am					
	The deposition will be recorded by this method: STEN	IOGRAPHICALLY AND BY VIDEOTAPE					
ø	Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:  SEE THE ATTACHED "EXHIBIT A."						
	The following provisions of Fed. R. Civ. P. 45 are attacked, relating to your protection as a person subject to a sull to this subpoena and the potential consequences of not determine the subpoena at the potential consequences.	bpoena; and Rule 45(e) and (g), relating to your duty to					
Date:	08/23/2016 CLERK OF COURT						
	CLERK OF COOK!	OR					
	* 18 ***	Stefanie R. Moll					
	Signature of Clerk or Deputy Clerk	Attorney's signature					
The name, address, e-mail address, and telephone number of the attorney representing (name of party)  COMMISSION FOR FOREIGN MEDICAL GRADUATES  , who issues or requests this subpoena, are:  STEFANIE R. MOLL, MORGAN, LEWIS & BOCKIUS, 1000 LOUISIANA, SUITE 4000, HOUSTON, TEXAS 77002;  713-890-5000 STEFANIE MOLL@MORGANLEWIS.COM							
	Notice to the person who issues on the person who is the person who i	•					

trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to

AO 88A (Rev 02/14) Subpoena to Testify at a Deposition in a Civil Action (Page 2)

Civil Action No. 4:14-cv-02126

#### PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

(date)	ppoena for <i>(name of individual and title, if ar</i> 	19)	
☐ I served the su	bpoena by delivering a copy to the nar	ned individual as follows:	
		on (date) ; or	
☐ I returned the s	subpoena unexecuted because:		
tendered to the wi		States, or one of its officers or agents, I e, and the mileage allowed by law, in the	
fees are \$		for services, for a total of \$	0.00
I declare under pe	nalty of perjury that this information i	s true.	
e:		Server's signature	
		Printed name and title	
		Server's address	

Additional information regarding attempted service, etc.:

#### IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

ARTIS ELLIS,		
Plaintiff,	§ 8	
<b></b>	8	
vs.	§	CIVIL ACTION NO. 4:14-cv-02126
	§	
	§	Jury Demanded
	§	
<b>EDUCATIONAL COMMISSION FOR</b>	§	
FOREIGN MEDICAL GRADUATES,	§	
	§	
Defendant.	§	

# DEFENDANT EDUCATIONAL COMMISSION FOR FOREIGN MEDICAL GRADUATES' NOTICE OF INTENTION TO TAKE THE ORAL DEPOSITION OF TROI BRYANT

TO: TROI BRYANT, 3318 La Mer Lane, Spring, Texas 77338-4145 or where he may be found.

Pursuant to Federal Rules of Civil Procedure 30 and 45, Defendant Educational Commission for Foreign Medical Graduates will take the oral deposition of TROI BRYANT on September 8, 2016 beginning at 11:00 a.m. and continuing until completion. The deposition will be taken before a certified court reporter at the offices of Morgan, Lewis & Bockius LLP, 1000 Louisiana Street, Suite 4000, Houston, Texas 77002. The deposition may be videotaped. All counsel are invited to attend.

Dated August 24, 2016

Respectfully submitted,

/s/ Stefanie R. Moll

Stefanie R. Moll State Bar No. 24002870 Federal ID No. 22861 smoll@morganlewis.com 1000 Louisiana, Suite 4000 Houston, Texas 77002 (713) 890-5000 - Telephone (713) 890-5001 - Facsimile

Of Counsel:
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(713) 890-5000 - Telephone
(713) 890-5001 - Facsimile

ATTORNEYS FOR DEFENDANT EDUCATIONAL COMMISSION FOR FOREIGN MEDICAL GRADUATES

#### **CERTIFICATE OF SERVICE**

I hereby certify that on the 24th day of August 2016, the foregoing was served via Federal Express to:

Alfonso Kennard, Jr. Keenya R. Harrold KENNARD RICHARD P.C. 2603 August Drive, Suite 1450 Houston, Texas 77057

Troi Bryant 3318 La Mer Lane Spring, Texas 77338-4145

/s/ Erin E. O'Driscoll
Erin E. O'Driscoll

#### **EXHIBIT A**

#### DUCES TECUM OF DOCUMENTS AND TANGIBLE ITEMS REQUESTED

#### **REQUEST NO. 1:**

All documents and things and communications to or from or between you and ECFMG before, during or after your employment at ECFMG.

#### **REQUEST NO. 2:**

All documents and things and communications to or from or between you and Artis Ellis (also known as Artis Fowler or Artis Harden or any variation thereof) from January 1, 2007 to present.

#### **REQUEST NO. 3:**

All documents or materials reviewed by you in preparation for your deposition.